

**REVIEWING THE 2020 CENSUS:
LOCAL PERSPECTIVES IN MICHIGAN**

FIELD HEARING

BEFORE THE

COMMITTEE ON
HOMELAND SECURITY AND
GOVERNMENTAL AFFAIRS
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REVIEWING THE 2020 CENSUS: LOCAL PERSPECTIVES IN MICHIGAN

MONDAY, JULY 25, 2022

U.S. SENATE,
COMMITTEE ON HOMELAND SECURITY
AND GOVERNMENTAL AFFAIRS,
Detroit, MI

The Committee met, pursuant to notice, at 9:58 a.m., the Frank Hayden Community Room, Wayne County Community College Downtown Campus (1001 W. Fort Street, Detroit, MI 48226), Hon. Gary Peters, Chairman of the Committee, presiding.

Present: Senator Peters

OPENING STATEMENT OF CHAIRMAN PETERS¹

Chairman PETERS. This committee will come to order.

I would certainly like to thank Dr. Ivery and the President of Wayne County Community College District (WCCCD) and this campus for welcoming us here today and hosting this hearing. I certainly want to thank each of our witnesses for coming out today, as well, and for each and every one of you and your dedicated service to the residents of Michigan. Today's hearing will examine the 2020 Census and its operations and impacts here in Michigan, as a local case study that I think illuminates national trends.

I want to first acknowledge Congresswoman Brenda Lawrence, whose district we are in here today, who has also been a champion on Census issues and certainly a key partner throughout the Census. Congressman Lawrence has also fought to ensure every person is counted, and we continue to work together on these issues in Washington. She has sent a statement for us today, and without objection, I will be entering her statement into the official record of the Committee.²

I look forward to hearing from our witnesses today about your community's experiences with the Census, including successes and challenges during the count, your incredible public outreach efforts during the Census, the concerns that we are now facing with undercounts, however, in our communities, and lessons learned that we would hope to apply to the 2030 Census. While my Committee has examined these trends at the national level, I believe, and certainly would argue, that it's essential that we get local perspectives, since the impacts are felt right here at home.

¹ The prepared statement of Senator Peters appears in the Appendix on page 33.

² The prepared statement of Congresswoman Lawrence appears in the Appendix on page 35.

Every 10 years, the Census serves as a national roadmap, determining how billions of dollars in Federal resources are dispersed, as well as congressional representation. The Census affects everything from school funding and classroom sizes to money for road construction, to where our businesses decide to locate. In Michigan, at least \$1800 per year in Federal funding is on the line if there is an inaccurate Census count. That's per year. Over 10 years, that's \$18,000 per person. We have to make sure that every person is indeed counted.

Every Census is a monumental task, and the 2020 Census proved especially challenging due to the public health crisis caused by the Coronavirus Disease 2019 (COVID-19) pandemic, and attempts by the former administration to politicize the Census, which compromised the collection of data. Census Bureau professionals ultimately resisted political interference and have worked diligently to deliver Census results in 2021 and 2022, and community groups in Michigan met the moment with historic and robust efforts to get people counted. I certainly believe that these "Get Out The Count" efforts, and the work of the folks here at this hearing, serve as a model for the nation.

Under the new Census Bureau director, Robert Santos, who my Committee confirmed into his position last year, the Bureau is working to be transparent about the 2020 Census results and challenges, determine what improvements can be made, and help communities move forward. As Chair of this Committee, which has jurisdiction over the Census Bureau, I have led oversight throughout the count, fought against political interference, and consistently pushed the Bureau to improve its efforts to count all Michiganders, particularly hard to count communities.

While we won many victories for the accurate Census, there are still many aspects out there that I believe fell short. There were significant undercounts of minorities across the nation, as well as young children, renters, and other disadvantaged groups. According to scholars at the University of Michigan (U of M) and Wayne State University (WSU), the 2020 Census likely undercounted, emphasis—Detroit's population by about eight percent in certain neighborhoods, a potential undercount of tens of thousands of people. This translates into real challenges for cities like Detroit, leading to decreased funding for services like Medicaid and Medicare, Supplemental Nutrition Assistance Program (SNAP) benefits, Head Start, and much more.

I look forward to hearing from our panel today about how residents in Detroit and in other Michigan communities would be hit hard by these results and efforts led by Mayor Duggan and other critical organizations to address them. As we examine ways to improve the Census for our communities, we must also discuss how our current categories limit representation for Michigan's Arab and Muslim American communities. Currently, the Census does not include a designation for people of Middle Eastern and North African descent, which means this vibrant community may not be receiving the right Federal support and resources to meet their unique needs.

For years, I have been urging the Office of Management and Budget (OMB), which sets all Federal data collection standards, in-

cluding for the Census Bureau, to add a specific Middle Eastern and North African (MENA) designation to ensure this community is accurately counted. I look forward to discussing how this additional category will help communities here in Michigan.

Today's hearing is an important opportunity to put our distinguished panel's perspectives on the 2020 Census into the official Congressional Record (CR) that identifies solutions that will help move forward and support every Michigander.

It is the practice of the Homeland Security and Governmental Affairs Committee (HSGAC) to swear in witnesses. If you will all please stand and raise your right hands?

Do you swear the testimony you will give before this Committee will be the truth, the whole truth, and nothing but the truth, so help you, God?

Mr. DUGGAN. I do.

Dr. MORENOFF. I do.

Mr. ANDERSON. I do.

Ms. GARCIA. I do.

Ms. FREIJ. I do.

Ms. KUHN. I do.

Chairman PETERS. I have been instructed to hold this microphone closer to my mouth, so when you are talking, after I introduce you, you may want to have it close to your talking, as well.

Today's first witness is Mayor Mike Duggan. Mayor Duggan has served as Detroit's Chief Executive Officer (CEO) since 2014, and oversees all of the City departments. Mayor Duggan and I have partnered together for many years on issues and initiatives to help the people of Detroit. Certainly, Mayor, I look forward to continuing that work in the years to come. Mayor Duggan was born in Detroit, and has spent his entire career working in the City to solve some of the most complex issues facing Detroiters, including crime, blight, access to jobs, economic development.

As Mayor, his priorities and accomplishments have included strong fiscal management, ensuring that long-term Detroiters have the opportunity to participate fully in the City's recovery, attracting new jobs to the City, and using resources, including Federal funds, for improving neighborhoods, reducing inter-generational poverty, and rebuilding the City's infrastructure.

During the 2020 Census, Mayor Duggan launched "Be Counted Detroit," a city-wide effort to encourage responding to the Census. Previously, Mayor Duggan served as CEO for the Detroit Medical Center, and as Deputy Wayne County Executive under Ed McNamara at the Wayne County law department.

Mayor Duggan, always a pleasure to see you. Welcome before this field hearing. You may proceed with your opening remarks.

**TESTIMONY OF THE HONORABLE MICHAEL E. DUGGAN,¹
MAYOR, CITY OF DETROIT**

Mr. DUGGAN. Thank you, Mr. Chairman. You and Congresswoman Lawrence have been fighting for an accurate Census count for awhile. Today, I want to ask that Congress take this up with even more urgency.

There has been a lot of talk about systemic racism in this country in the last couple of years. I am disappointed to say, the U.S. Government is engaging in systemic racism, and that's in the conduct of the U.S. Census. The city of Detroit has been objectively undercounted by 50,000 people. All we want is a fair chance to appeal.

The Census was done in 2020; it's now July 2022, a year and a half later, and the Census Bureau has yet to put out an appeal process. We have no remedy, and so that is why we are here today asking for your help. The racial undercount is not just my opinion. The Census Bureau Director Robert Santos, on March 10th of this year, reported that the Black population in America was undercounted by 3.3 percent, nearly a doubling of the two-percent undercount 10 years before. The Latino population was undercounted by one and half percent in 2010. Director Santos reports that undercount tripled to five percent in 2020.

In a city that is 84 percent Black and Brown, that undercount hits the city of Detroit harder than any other community in America. \$10 million a year in State revenue sharing, and much more in Federal funds are being lost to our residents for critical services because of this undercount.

I was a Census taker in 1980 when I was an undergrad at the University of Michigan, and the process really has not changed much in the last 40 years. There's a voluntary period in which people can mail in their Census information, and after that is the non-response follow-up, the intense door-to-door effort to count those who did not mail in. The only thing that has changed in 40 years is this year an internet response option was added, and when that happened, that exacerbated the differences between Black, Brown, White, wealthy and poor.

People who do not have computers or internet access were even less likely to have responded voluntarily, which means we needed a more vigorous non-response follow-up than ever before. Instead, the traditional 10-week non-response follow-up on the streets was cut by the Census Bureau to seven weeks. When the city of Detroit finished the voluntary period, we were at 49 percent.

There were communities in this country that were well off that were at 80 percent. You needed to pour the resources into the streets of Detroit in that seven week period that started August 11th. But as they were giving up in July, the first of July, the director of the Detroit Census office quit. They were hiring all of these people to do a quick seven-week process; they had no director. They did not replace him the second week of July; they did not replace him the fourth week of July; they did not replace him when the people hit the streets on August 11th. They did not replace him until nearly the end of August when the follow-up was almost half

¹ The prepared statement of Mr. Duggan appears in the Appendix on page 36.

over. The testimonials that we have submitted from various Census workers that talk about the absolute chaos, the staff shortages, the fact they would sit around until three or four in the afternoon before they had even got their assignments to go out on the streets. They would be out on the streets and find out they were in an area that was already counted.

One school teacher said, "I was there five days in a row and never got a single assignment." Probably most troubling, the Census Bureau standard says you do non-response follow-up with six visits to a house; in an urban situation, you can get by with three. The testimonials of the workers were the supervisor said, "Just visit once, that will do." So we know what happened. We wanted to appeal, so we hired Professor Morenoff and the University of Michigan to do a study. The Census Bureau will tell you how many occupied houses they counted in any individual block.

The University of Michigan and the team took ten neighborhoods in this city and matched the households the Census Bureau counted, and this was a door-to-door door-knocking effort with the effort of some Wayne State students. I can give you one example; in the Boston-Edison neighborhood the Census Bureau said there 399 occupied houses. The door-to-door, door-knocking found 484. They missed 17 percent of the houses.

But what is even harder to believe is the U.S. Postal Service (USPS), that has continually updated occupied houses, had 484. The Post Office was almost accurate. Instead of doing the Census, if they would have followed the postman down the street, they would have had a better count. What the U of M report shows across the city, there was close to an eight percent undercount, which would be 50,000 people.

One last point I would like to make. It did not stop with the decennial Census. The Census Bureau just put out it is 2021 estimate, the one-year update. They said we lost 7,000 people. I defy you to drive around the city of Detroit today, where there are cranes everywhere, where there's housing shortages and rents rising, where houses went for over \$100,000 a year for the first time, and I am trying to find a place for people to live, and tell me where 7,000 people left.

In fact, Detroit Edison (DTE) Energy said, in last year, they had 8,000 more housing units with gas and electricity. How do you have a situation where utility companies have a major increase in the number of occupied houses and the Census Bureau can't count them? They are exacerbating a problem from the decennial Census with the annual estimates.

Mr. Chairman, all we want is objective standards of appeal; we can't go back in time. We want an appeal process that will allow us to use objective data like the utility data, like studies from the University of Michigan, like the Post Office data. That is what we want. If your committee could help speed up that process and give us a fair chance, the people of Detroit just want to be counted like everybody else in America. Thank you, Mr. Chairman.

Chairman PETERS. Thank you, Mayor, and thank you for all your efforts, and for championing this cause. We are definitely focused on it.

Our next witness is Dr. Jeffrey Morenoff, professor of public policy and sociology at the University of Michigan where he also serves as a research professor in the population study center and survey research center. Dr. Morenoff's research focuses on neighborhood environments, inequity, inequality, crime and criminal justice, and the social determinants of health, racial, ethnic, and immigrant disparities in health, and antisocial behavior. Dr. Morenoff is part of the University of Michigan team who conducted a clinical study on the likely Detroit undercount, as referenced by the Mayor.

Dr. Morenoff, welcome to the Committee. Make sure your microphone is close. The Mayor led very well and knew exactly what he was doing. Clearly a professional.

You may now proceed with your opening remarks.

**TESTIMONY OF JEFFREY D. MORENOFF, PH.D.,¹ PROFESSOR
OF PUBLIC POLICY AND SOCIOLOGY, UNIVERSITY OF MICHIGAN**

Dr. MORENOFF. Thank you, Chairman Peters. I appreciate the opportunity to testify today about the 2020 Census. The decennial Census is arguably our nation's most important source of data. The results of the Census are used for congressional apportioning and defining State legislative districts. Census results also determine how more than \$1 trillion in Federal funding is distributed each year to local, State, and tribal governments, as well as nonprofit organizations and households across the country.

This money is used to fund many different programs that critically impact local governments, including education and community development grants, employment and training services, road construction, transportation, Medicare, Medicaid, and much more. Thus local governments have a vested interest in ensuring that their constituents are accurately counted. I was surprised and puzzled when I first saw the 2020 Census population count for Detroit, which was slightly less than 640,000 people.

To put this in context, in 2019, the Census Bureau estimated Detroit's population to be slightly over 670,000 people. The 2020 Census was suggesting that Detroit lost about 31,000 people, or 4.6 percent of its population, in just one year. An annual population loss on this scale would far exceed any of the annual population losses that Detroit had experienced over the previous nine years. Moreover, the quality and completeness of the Census population count is inextricably tied to the accuracy of its housing count, and the 2020 Census produced a very puzzling count of Detroit's housing.

The 2020 Census showed that the City had lost 13.8 percent of its housing stock in a single year. No other major U.S. city experienced a comparable loss of housing units from 2019 to 2020, and Detroit had not experienced anything close to such a dramatic loss in the previous nine years. Therefore, when Mayor Duggan's office reached out to me and a group of other local demographers to ask if we could conduct an independent and scientifically rigorous study on the 2020 Census count, I felt compelled to get involved

¹ The prepared statement of Dr. Morenoff appears in the Appendix on page 125.

and learn more about what might have produced these anomalous results.

Our research involved an extensive visual housing audit of over 114,000 addresses located within over 4,000 Census blocks where the city of Detroit was challenging the housing count. This audit revealed that the 2020 Census undercounted the number of housing units on 70 percent of the Census blocks that we reviewed. Simply put, the Census failed to count over 78,000 housing units on these blocks. Our housing audit also showed that the housing undercount was most pronounced in neighborhoods with the lowest self-response rates to the 2020 Census suggesting that not enough resources were invested in field operations to complete the count.

As Mayor Duggan explained in his testimony, and the attached statements from 11 Census workers support, the field operation in Detroit started late, ended prematurely, and was inadequately staffed and supervised. Our research also revealed that the 2020 Census substantially undercounted the number of occupied housing units in ten block groups that where we compared the Census housing data to data from the U.S. Postal Service and the door-to-door canvas. We estimated that the 2020 Census undercounted the population in these areas by eight percent.

If undercounts of a similar magnitude exist in a majority of the cities, more than 600 block groups, the ultimate size of a population undercount could be in the tens of thousands. The decennial Census is a massive and complex operation. Although I have been critical of the 2020 Census for undercounting Detroit's population and residential housing stock, I also want to acknowledge the severe and unprecedented operational challenges that the Census Bureau faced, and commend the Bureau for its heroic efforts in adapting to extremely difficult circumstances created by budget concerns and the pandemic. But as the panel to evaluate the quality of the 2020 Census at the National Academies of Sciences (NAS), Engineering and Medicine recently concluded, there are well-founded concerns about the 2020 Census that need to be investigated.

As the Mayor related in his testimony, for Detroit, a principal concern is that between 2019 and 2020, the Census Bureau appears to have dropped over 58,000 addresses from its master address file (MAF). Based on our research, this seismic decline in housing stock is likely inaccurate and translates into a significant population undercount.

There's a real human impact behind this undercount. Millions of dollars that should have gone to programs providing affordable housing, nutrition assistance, early childhood education and more will not reach the people who need them. Entire communities may be under-represented in Congress and State legislatures because of lost seats.

This is exactly why local governments, including Detroit, should be empowered to not only question but also challenge the accuracy of the housing and population counts in their jurisdictions. But as of now, the data needed to decisively show an undercount are hidden from these localities. Without the master address file and other related information, these communities have no choice but to retain consultants and lawyers to develop studies and arguments to re-

veal and rectify areas in the count that would be easily discovered from the Census Bureau's data directly.

Although privacy concerns are important and must be addressed, these concerns alone do not justify shielding Detroit from its own metrics. Transparency and accuracy demand that the Census Bureau be more forthcoming in sharing data files with the communities most impacted by them. Thank you.

Chairman PETERS. Thank you, Dr. Morenoff.

Our next witness is Charles Anderson, President and CEO of the Urban League of Detroit in Southeastern Michigan where he served as the Chapter's 6th and 8th president. For two decades, Mr. Anderson has been responsible for the vision, leadership, and the direction of the Urban League of Detroit & Southeastern Michigan. Mr. Anderson helped lead local and statewide community outreach efforts during the 2020 Census. Mr. Anderson was previously involved with Charlotte National Association for the Advancement of Colored People (NAACP) Youth Council, where he later served as President and helped organize the NAACP Youth Council radio show, "Talk to the People," on WGIV radio in Charlotte, North Carolina, and co-hosted the NAACP television program, "Experience!" He has also served on the NAACP national staff as director of the Midwest Region.

Mr. Anderson, welcome to the Committee. You may proceed with your opening remarks.

TESTIMONY OF N. CHARLES ANDERSON,¹ PRESIDENT AND CHIEF EXECUTIVE OFFICER, URBAN LEAGUE OF DETROIT AND SOUTHEASTERN MICHIGAN

Mr. ANDERSON. Thank you, Chairman Peters. I do not know where you got that information from. You went way back in my history. Thank you very much for reminding me of those things. But thank you also for this opportunity to testify today on "Reviewing the 2020 Census: Local Perspectives in Michigan." Specifically, thank you for bringing the focus of the Census home to Michigan, which unfortunately and regrettably lost a congressional seat following the 2020 Census. I do want to also say thank you to Mayor Duggan for advocating for a complete count of Detroit and formally challenging our Census Bureau's 2020 numbers.

I am honored to be part of the witness panel of outstanding leaders, experts, and community organizers who continually strive to make the State of Michigan and the city of Detroit an international metropolis that serves the needs of all of its residents.

The Urban League is one of 92 affiliates of the National Urban League (NUL) across 36 States and the District of Columbia. The Urban League movement serves well over two million people per year and enables African Americans and others in underserved communities to achieve their highest human potential and secure economic self-reliance, parity, power, and civil rights. I am glad and proud to say that the Detroit Urban League is serving between 13 and 15,000 citizens each month, more than 125,000 annually, and we have programs such as Special Supplemental Nutrition for Women, Infants, and Children (WIC) and Urban Seniors Jobs Pro-

¹ The prepared statement of Mr. Anderson appears in the Appendix on page 151.

gram for seniors where funding in our community is based on those Census numbers, so we are very concerned about an accurate count.

As part of its mission, the National Urban League did convene the 2020 Census Black Roundtable with over 20 national civil rights organizations to organize and strategize ahead of the many obstacles that threatens an accurate count of Black people in this country and, in turn, the essential resources that are needed.

Over the years, in past Censuses, it has been a real privilege to partner with the U.S. Government to conduct the Census. But unfortunately here, you kind of mentioned, Mr. Chairman, the 2020 Census did not feel like a truly friendly effort. The Urban League movement absolutely applauds the Census Bureau's rank and file staff for its work, but it is really difficult under unheralded political influences and global pandemic that is still wreaking havoc on the lives of many, including the city of Detroit. It is still challenging to feel like we were working together to make sure that there was an accurate count.

We used our efforts on social media, used all the available resources, with some extra focuses on social media, to make sure that we communicated with the client, the 125,000 people that we would serve in a year just to send out information and encourage them to participate in the Census. But it was a challenging year, as has already been shared.

The Urban League does urge the Census Bureau to continue to identify opportunity to collect the numbers to reflect an accurate count of our community so that Federal funding needs are addressed. We would urge the Census Bureau to extend more flexibility in reviewing local challenges to the 2020 Census.

Finally, we would suggest that there are concerns with prisoner gerrymandering. Michigan has an incarceration rate of 599 per 100,000 people, including jails, prisons, immigration detention, and juvenile justice facilities. Our country locks up a higher percentage of its population than almost any democracy. This prison industrial complex is felt especially hard by the Black community, who make up 14 percent of the State's population, with 50 percent of those who are imprisoned. One in 68 Black people that are in prison in Michigan, and arguably many of them could have been counted as Detroit citizens, if, in fact, there was consideration given for that.

We appreciate the opportunity to focus on where the Census is, and the opportunity we have to correct the mistakes that were made during the Census. Thank you.

Chairman PETERS. Thank you, Mr. Anderson.

Our next witness is Jane Garcia, Vice Chair of the Latin Americans for Social and Economic Development (LA SED), a nonprofit agency serving the Detroit Hispanic community. LA SED assists community members with a variety of services, and helped conduct Census outreach in 2020. Ms. Garcia herself is also a former Census employee.

In addition, Ms. Garcia is a founder of Corporate Responsibility through Advocacy, an organization that advocates for minority board members and minority representation at all levels. Prior to serving on the board, Ms. Garcia served as part of the Executive Committee of the United Way Community Services for 20 years.

Ms. Garcia is a licensed social worker, and has been a community activist for over 45 years.

Ms. Garcia, welcome to the Committee. You may proceed with your opening remarks.

**TESTIMONY OF JANE C. GARCIA,¹ CHAIR LATIN AMERICANS
FOR SOCIAL AND ECONOMIC DEVELOPMENT**

Ms. GARCIA. Thank you so much, Senator. We really are very grateful that we are participating. The issue of the Census has been very close to our hearts. For many years, I served for the Census. I did four Censuses. I understood the importance of the outreach and the participation from all levels, government, local government, and the nonprofits, especially the people that did not speak English. We thought that bilingual services needed to be really stressed out during this past Census.

To me, this Census was not prepared for the influx of immigrants, did not want to count immigrants, if I remember correctly; I heard. The issue is very clear that the undercount was going to be going across the country, not just in Michigan. We were very fortunate, the Mayor got on board very early and tried to get out as much information as possible to the communities. We stressed this, that in 2012, somebody in power decided that they were going to close 50 percent of the regional offices. Unfortunately, one of them was in Michigan, and that one was really tough on us, because they were the ones that did all the surveys, and those were surveys that included the estimates. They were very important to keeping up the information that led up to the Census.

People do not realize that the Census starts for 10 years to get prepared. The reason is, because we have so much—they have so much to do and the short time of 10 years passes real fast when we are trying to make sure that everyone is counted. The benefits that is going to come back to our city. Unfortunately for Michigan, we lost a congressional seat. That is going to be really hard on us for the going forward when you look at how the people will fight for representation. I thought that was very important to mention that.

The undercount was very specifically noticeable, because we did not have the partnerships. Like the Mayor had said before, they started late and ended early, so the issue was very clear there was not enough resources.

We need you to please stress, Mr. Senator, that resources need to be put on now to continue; otherwise, in 2030, Michigan may not even be here.

Seriously, when you look at what we need to do, we need to make sure that they have proper people that represent the community, that they go door to door, that they have nonprofits that are partners. I am going. “I am going” means that you need to make sure that they get the information that is being vital to them; the surveys, the estimates, the data, everything that is needed for us to grow, and I think that that is going to be very important as we go forward for the 2030.

¹The prepared statement of Ms. Garcia appears in the Appendix on page 157.

Like I said, implementation of reopening some presence of Michigan we think is vital, and especially to have people that represent our communities that have been underserved. I think that we need to stress that more than ever. The population obviously is moving more southwest, but we lost a lot of congressional seats in the northeast area, so we need to make sure that a more accurate count is done going forward.

I think they need to really look at what exactly they did with any of the resources that they did have. It did not come back to the community, and that is something they need to really stress as we move forward. The Census is a very expensive process. We understand that, but we do know that if we do not have that resources that actually do the outreach to the community, that especially is underserved, that we are going to have a real problem.

I thank you. I am hoping that you go back and you advocate that they look at making sure that Michigan may have some bit of a presence so that continues to grow, and that we do not lose any more population, at least the undercount, that will not be more significant. Thank you so much, sir.

Chairman PETERS. Thank you. Thank you, Ms. Garcia.

Our next witness is Maha Freij, President and CEO of Arab Community Center for Economic and Social Services (ACCESS). It is the largest Arab American community nonprofit in the United States. Ms. Freij is a dedicated visionary in the Arab American community, whose work focuses on philanthropy and building strong institutions to strengthen the voice of the Middle Eastern and North American community in American civil society. This has included advocacy around representation of this community in the Census and other Federal data. She has been a key leader in growing ACCESS from a regional human service organization to the only national Arab American community foundation in the United States, and a leading organization addressing the many complex issues that face the Arab American community. In addition, Ms. Freij currently serves as a member of the Michigan State Board of Ethics, and as a trustee on the Council of Michigan Foundations. Welcome to the committee. You may proceed with your opening remarks.

**TESTIMONY OF MAHA FREIJ,¹ CHIEF EXECUTIVE OFFICER,
ARAB COMMUNITY CENTER FOR ECONOMIC AND SOCIAL
SERVICES**

Ms. FREIJ. Thank you Senator, and good morning, everyone.

It is truly my honor to address this Committee on behalf of ACCESS, the nation's largest service provider to Middle Eastern and North African communities. For the MENA community, and the entire country at large, the successful execution of the decennial Census is one of the most important activities that the United States government supports.

The decennial Census produces our fundamental understanding of who lives in our country, what they need, where they are, and what they are going through. Input from community-based organizations like ACCESS is a vital part of the preparation for this com-

¹The prepared statement of Ms. Freij appears in the Appendix on page 158.

mittee's oversight process. Community-based organizations are the connective tissue between policymakers, agency officials, and individuals, families, and communities, who seek representation in the Census.

This was the case for many MENA Americans and individual of MENA descent who fought for formal recognition by the Census Bureau in a long and rigorous process where the Census Bureau convened community representatives and technical experts around the question of how to best test, assess, and implement a response category for MENA self-identification. At the conclusion of this process, Census Bureau issued a formal recommendation to the Trump administration to use a dedicated Middle Eastern or North African response category.

However, before OMB could decide on the Census Bureau's recommendation, the Trump administration's Department of Commerce decided to undermine and ignore the Census Bureau's official recommendation. As a result, individuals from the MENA region were mis-recognized on the decennial Census. They continue to be misunderstood, understudied, and formally excluded from the policymaking process. As we begin the Census preparation process, we must remember that a MENA response category has already been researched, tested, and formally recommended.

We must also remember that unlike in 2018, the current administration supports the mission of the Census Bureau to develop a complete and accurate portrayal of our nation's diversity. ACCESS remains hopeful and expectant that a MENA category can be established across the Federal Government in time for the enumeration of the 2030 Census. However, ACCESS also recognizes that MENA inclusion is only part of the work of closing Census coverage gaps, which has historically led to poor Census response rates in the State of Michigan.

In the lead up to the 2020 Census, ACCESS co-chaired the Michigan Nonprofit Complete Count Committee with the Michigan Nonprofit Association (MNA). The objectives of the committee were simple; to improve response rates across the State of Michigan and increase understanding of the Census impact by providing culturally and linguistically relevant civic education through direct engagement at the grassroots level and through trusted voices.

We also intended to push back on the Trump administration's citizenship question, and the politicization of the Census Bureau's statistical function. Our impact was felt in both process and outcome. All together, the committee had direct representation of 82 out of 83 Michigan counties. We were able to raise the State of Michigan's response rates from near the bottom in previous Census periods to among the top ten nationwide in 2020.

Through that work, we believe that we have built a model that can be replicated across the Nation to close gaps in Census coverage and improve the public understanding of its impact. Throughout the remainder of this hearing, I would be happy to speak other lessons learned from the preparation for and execution of that 2020 Census, which suffered from an unprecedented pandemic, a systemic politicization of statistical functions, and communication breakdowns between government and civil society.

Among these learned lessons include the importance of maintaining adequate funding levels for research operations, field personnel, digital infrastructure, and data security. It also includes our lessons concerning the value of preparing community-based organizations to effectively communicate the data integrity and security of the Census operations.

I eagerly await your questions and look forward to the work of preparing for the 2030 Census that returns the decennial Census to its original function. Thank you.

Chairman PETERS. Thank you, Ms. Freij.

Our final witness is Kelley Kuhn, President and CEO of the Michigan Nonprofit Association, a charitable organization dedicated to nonprofits and the communities they serve by promoting anti-racism and social justice. During the Census, the Michigan Nonprofit Association led the statewide Census 2020 Michigan Nonprofits Count Campaign, mobilizing nonprofits and government partners to encourage Census participation.

As president and CEO, Ms. Kuhn is the driving force behind Michigan Nonprofit Association's strategic direction and operations, and has served in several different roles with the organization over the past 14 years, including Vice President. Previously, Ms. Kuhn worked for the Greater Jackson Chamber of Commerce, the Jackson County Community Foundation, and the Jackson Nonprofit Support Center.

Ms. Kuhn, welcome to the Committee. You may proceed with your opening remarks.

TESTIMONY OF KELLEY J. KUHN,¹ PRESIDENT AND CHIEF EXECUTIVE OFFICER, MICHIGAN NONPROFIT ASSOCIATION

Ms. KUHN. Thank you, Chairman Peters.

Good morning. My name is Kelley Kuhn, president and CEO of Michigan Nonprofit Association. Founded in 1990, MNA is a 501(c)(3) statewide membership organization that serves nonprofits through advocacy, training and resources. MNA is dedicated to promoting anti-racism and social justice in the nonprofit sector.

The 2020 Census was more than a population count. It was an opportunity to make a difference and to shape Michigan's future.

MNA and the Council of Michigan Foundations, with financial support of more than 40 foundations and the State of Michigan launched an ambitious campaign to mobilize nonprofits and help Michigan get a complete and accurate count in the 2020 Census. The campaign raised more than \$10 million and engaged hundreds of nonprofits in a nonpartisan, multi-racial coalition with for-profit organizations and government.

Nonprofits invested energy, time, and commitment in the Michigan Nonprofit Counts Campaign to ensure a fair and accurate Census for all communities—particularly Michigan's historically undercounted populations—people of color, immigrants and their families, young children, seniors, people living in poverty, and people experiencing homelessness. The undercount has led to inequality in political power, government funding, and private-sector investments for these communities; thus, the Nonprofit Counts Cam-

¹ The prepared statement of Ms. Kuhn appears in the Appendix on page 163.

paigned was developed, leveraging nonprofits as trusted outreach partners with a specific goal to reach these undercounted groups.

To reach diverse populations and encourage completion of the Census, as well as serve as champions of the campaign, MNA entered into a partnership with New Michigan Media, a network that includes more than 140 ethnic and non-traditional media outlets across Michigan. Dr. Hayg Oshagan, president of New Michigan Media, convened three minority media summits that informed the messaging directions of the campaign.

The campaign's intentional focus on diversity, equity, and inclusion in grantmaking resulted in all grants being awarded to organizations serving historically undercounted populations.

The campaign worked with government officials at all levels to maximize effectiveness. This cooperation primarily resulted in avoiding duplication of efforts and enhancing outreach. We received regular updates from Michigan's State demographer, collaborated with the Census Bureau's partnership specialists, and held specific training sessions and webinars on how to engage local government entities so they were ready for the 2020 Census.

While getting the Census count has never been an easy task, when we started this journey in 2017, we could not have predicted what was to come in 2020. We faced multiple challenges, including confusion over the late addition of a citizenship question, disinformation, misinformation, and a global pandemic that caused shifting deadlines and wreaked havoc with our Get-Out-The-Count plans.

With Michigan under a stay-at-home order and suffering one of the highest COVID-19 rates in the nation in the spring of 2020, the Nonprofit Counts Campaign had to quickly retool. Nonprofits were creative and flexible, yet still sensitive and safe, given the crisis. The campaign adjusted by expanding digital outreach, creating videos for children now that kids were at home, expanding texting campaigns and identifying new partners. Nonprofits also had a presence in the few places people were still frequenting in person, such as food banks. Filling out the Census online, by mail or over the phone was not an option for some due to a lack of internet access, language, reading barriers and other concerns.

Thanks in part to Nonprofits' hard work, Michigan finished eighth in the United States in self-response rate. On June 17, 2020, we became the first State in the nation to have exceeded its 2010 self-response rate. We also ranked third-best in the nation for the largest gain in statewide response from the 2010 Census, rising from 67.7 percent to 71.3 percent.

Most importantly, at the local level, in every Census tract where the Nonprofit Campaign was active, the self-response rate averaged seven percent higher than in Census tracts where the campaign was not active.

Going forward, we are sharing concrete examples of ways our partners can engage in Census work throughout the decade. Underlying the activities are the policy and advocacy work that needs to be done all decade long to ensure adequate funding for the Census Bureau, advocacy for updated questionnaires, including revised race/ethnicity questions, and sexual orientation and gender identity questions, and input on operational changes, and any legislative

recommendations resulting from the experiences and aftermath of the 2020 Census.

MNA regularly communicates with the network that was built in 2020. We include results of the Census data, webinars on using the data, opportunities for advocacy, and much more. By investing our time now, we can lay a strong foundation for those who will work to get our communities counted in 2030.

The success that Michigan had in the 2020 Census could not have happened without nonprofits. Nonprofits are trusted entities serving as catalysts for continued civic and community engagement.

The Nonprofit Counts campaign built a strong foundation for a fairer and more equitable Michigan, where everyone counts, and every voice is heard.

I would like to thank Chairman Peters and his staff for the opportunity to speak today. We are grateful for your work on the Census and everything you do on behalf of Michigan's nonprofits. Thank you.

Chairman PETERS. Thank you, Ms. Kuhn, and thank you to each of our witnesses here today.

It is clear in listening to the testimony that we had some significant challenges before us to get through this Census. Some of these issues emerged early. I would argue that part of the problem was the fact that the Republican Congress in place from 2012 to 2016 under-invested in the Census, and as many of you mentioned, early investments are critically important for getting an accurate count at the end. Then we had the COVID pandemic hit. That added even more challenges that made that problem even more apparent.

In addition, and I have heard from some of you about Trump administration interference, and clearly, we saw that firsthand in the final months and weeks as the administration actually cut the Census short. When we were trying to make sure the time was taken to actually make sure that we have an accurate count, it was cut short. This occurred despite a lot of pushback from myself and my colleagues, as well as all of you on the ground who were saying, "We need to make sure we do this right. Let's not cut this short." That's what happened.

My question then, for all of the witnesses—I will start with you, Mayor Duggan, and then I think we just go down the table in the order that you are at. You have already discussed some of the top challenges, but I think for the Committee record, it is important for us to hear.

Now, what were the top one or two challenges that were really very difficult in your community, or the communities that you serve, that we certainly want to focus on all the challenges. But what are the two things that stand out that we need to be focused on, Mayor?

Mr. DUGGAN. As a number of the witnesses have indicated, we had an enormous community effort going. The problem was entirely the central staffing, and there were some dedicated workers working for the Census Bureau, lifetime Detroiters who were out there, and they were telling us, "We cannot get our lists." Then as it got to be September and they were behind, they started getting messages from the Census Bureau: "\$500 relocation fee if you will

move to Indiana.” The time Detroit was the furthest behind, the Census Bureau was incentivizing lifetime Detroiters to move to another State.

Probably the most depressing thing—and something I hope somebody will look into—in May the Census Bureau had decided to go from 10 weeks to seven weeks non-response follow-up. But in May, they said, “We are going to put resources in in 12 States to start a week early, add a week to the non-response follow-up.” We were excited. We were gearing to get up early. They were genuinely trying.

Then when they announced where the extra week was in the State of Michigan, it was in Oakland County. Now, at the time, Oakland County had a 77 percent response rate; Detroit had a 49 percent response rate. The Census Bureau said, “We are going to put extra counting effort in to the State of Michigan, and it is going to go to Oakland County.” This was it. No matter what everybody here did, when the people who are actually running the program stick their thumb on the scale, it just became impossible to overcome.

Chairman PETERS. Thank you, Mayor.

Dr. Morenoff, what did you see? What is a significant challenge or two?

Dr. MORENOFF. Yes, thank you. We have talked about some of these. We have talked about the uncertainty related to the pandemic. We also talked about the uncertainty and chaos from the proposal to add a citizenship question. What it definitely did not touch on as much was the budgetary uncertainty that the Census faced, especially in the years leading up to the Census, which led to the cancellation of some tests and programs; one of them being the active block resolution program, which would have more effectively guided the field operation.

But as the Mayor was pointing out, I think the biggest challenge here was, the set of challenges were the ones associated with the non-response follow-up operation. There was this emphasis in the 2020 Census for the first time on internet self-response. As the Mayor already indicated in his testimony, that created real disparity, especially in Black and Brown communities where people have less access to the internet. It also led to a lower self-response rate citywide in 2020 than we had in 2010, when it was more of a paper-pencil operation.

I also want to emphasize that in our data, this housing audit that I talked about, we found that the housing undercount that we documented was three and a half times more pronounced in neighborhoods with the lowest self-response rates. That is where less than a quarter of the residents were able to self-respond to the Census, compared to those in the highest self-response neighborhoods with the highest self-response rates where over three-quarters were able to self-respond on the internet.

These are the places that need the most field work, the most non-response follow-up operation. The very powerful statements attached to the Mayor’s testimony from Census workers really show clearly that they were not getting it. It was late getting started, early ending, but it was also mismanaged along the way.

I think what is illuminating here is that the Census has already showed us—the Census Bureau, that when you have to be more non-response follow-up, you are likely to get less accurate population counts. We are showing that that also holds true for housing counts, that one of the reasons why we are not counting enough population is that we are not sending enough field workers out to actually illuminate the housing units, which is then translating into an undercount in the population. Thanks.

Chairman PETERS. Thank you. Mr. Anderson.

Mr. ANDERSON. Yes, Senator. It is hard to add anything after the Mayor and Dr. Morenoff speaks. But I would like to add that, as Ms. Garcia mentioned in her testimony, the Census closed offices. Historically, there had been people between 2010, 2020, or folk who you worked with, you were involved with; they were part of the community, they knew the community and you had a relationship with them—and so those ongoing, year-round relationships were lost when offices were closed and staff were relocated, and you started hiring people who were not familiar—or as the Mayor said, were incentivized to leave the community. I think there were mixed messaging.

The messages that were out there were the questions about citizenship, questions about whether the Census was going to end early or continue on. As Ms. Kuhn was saying, the community is making all of this effort, nonprofits are talking to people, and then we are being challenged by what others are saying. I would add that that was part of the problem for making sure the Census count was accurate.

Chairman PETERS. Thank you. Ms. Garcia.

Ms. GARCIA. Yes. Thank you, Senator. One of the things I think is real important, like we had mentioned, presence is going to be very important as we move forward, and we do not have the presence today. I think that immediately a presence of some kind of a regional offices, maybe that can continue. Nowhere in our history had we ever seen the government cut 50 percent of any governmental units in an area. They went from 12 regional offices to six. That just added to the confusion.

I also think that as you look forward, Senator, that you look at the people that are at the Bureau of the Census, and please do not put the people that are at the Bureau of the Census in charge of the 2030. Obviously, I am not very confident that the ones that were in charge did a good job for 2020, so I think all that needs to be looked at. Because I think it is very important that partnerships be emphasized, because partnerships and relationships—to making sure, whether it is the Indian reservations or our local communities that do not get left out because there is a relationship, that we continue to build on that. I would appreciate that, sir.

Chairman PETERS. Absolutely. Thank you. Ms. Freij.

Ms. FREIJ. Senator, a lot has been said, of course. But the main thing I want to reemphasize here for our community in particular, that the biggest challenge was the fear and mistrust that developed in the community because of the politicization of the operations of the Census. Of course, having the pandemic and dealing with an immigrant community that has layers in terms of language and other barriers. With the pandemic, people needed access to Wi-Fi.

They needed to be comfortable with using digital tools. All these I would say they were major, major, special challenges during the 2020 Census, in particular for our community.

In addition, the funding level and investment from the Census Bureau was not really implemented as it was originally planned for. Investment in community-based efforts to have education campaigns and adequate number of workers that would reach out to community members, and hold them by the arm, and gain their trust to make sure that they do fill the Census were cut short, and these efforts were actually funded by the private foundations and State government. I would say these two areas are the main biggest challenges we faced.

Chairman PETERS. All right. Thank you. Ms. Kuhn.

Ms. KIHN. Thank you. From the very beginning, just echoing what has already been said, there was a lot of confusion, misinformation, and a lack of understanding of how the Census data was—and how it is to be used for.

Also, what has already been stated, the lack of trust. When we think about trust in Federal and local government, for some it was about experiences in countries from which they have immigrated, as well as experiences that they have had while being in the United States.

Last, there was security concerns and lack of understanding of how protected the data is. These were concerns throughout the campaign that we experienced and were very difficult to overcome in the communities that we were working with.

Chairman PETERS. Thank you. I am going to ask this question of all the witnesses again, and we are going to keep the same format. Mayor Duggan will kick it off.

We have raised a number of challenges, and I want to drill deeper into these challenges, because we make improvements, and also have an opportunity to fix what may not have worked the first time, because it has a significant impact on communities. I am going to spend quite a bit of time on that. But before we do that, I think it is also important for us to focus on some successes. We had a lot of great work.

All of you were involved in a lot of great work here on the ground to get out the work. I would like each of you to mention what you think was a success in the 2020 Census, what was perhaps an improvement from 2010, and perhaps some local efforts that we should look at as a model going forward for future Censuses, because clearly we did a lot of great things on the ground.

Mayor, you were instrumental here. I know there were a lot of great successes in the city of Detroit. I would like to hear a little bit of that for the committee's benefit.

Mr. DUGGAN. In the city and statewide, I have never seen the level of cooperation. We had the Latino community, the Arab American community, the Asian communities. You go right down the list—the Bengali communities. We had people out with trusted voices everywhere, and I think it did pay off statewide. Across the State of Michigan, there was an uptick, and it was because of all of the efforts that you heard about today, and I think there is a lot to be proud of in the community effort. The problem was the people actually in charge of counting were not there. But I think

everybody up here ought to take credit for really what turned out to be a remarkable number statewide.

Chairman PETERS. Thank you, Mayor. Dr. Morenoff.

Dr. MORENOFF. Yes, thank you. I would echo everything the Mayor just said, and also add a few thoughts of my own. First of all, the mere fact that the 2020 Census was completed as close to schedule as it was is a major accomplishment. Despite all the criticisms I have of the way that the 2020 Census was operated, especially locally, the Bureau itself and the really fine data scientists and people working at the Census Bureau deserve a ton of credit for adapting to the most difficult of circumstances.

They also deserve credit for some planning in the years leading up to the Census really early on, as some of our witnesses have talked about. These include things like the increased use of field automation, the wider use of administrative records in Census processes, a modernization of the way they develop address lists, increased use of internet response, and this new non-ID processing system, which made it more feasible for people to complete a Census return anytime, anywhere, without requiring contact in the mail or by an enumerator.

The problem is that these are things that work very well nationally, on a global scale, but the Census count is really a hyper-local phenomenon, and they do not work equally well everywhere. As we have already talked about, in places where so many people have trouble accessing the internet, where administrative records may not be as complete and accurate as they are in other parts of the country, we cannot depend on these innovative, but, in other places very successful efforts. We need more work on things like the ground game, the non-response follow-up operation, which we have already talked about. Thanks.

Chairman PETERS. Thank you. Mr. Anderson.

Mr. ANDERSON. Yes. As I said in my written testimony, I did give commendations to some of the regional staff that were in place, the professionalism that in spite of political interference, they persevered and pressed on to get the job done. But I also thought it was helpful and very significant that Mayor put resources in place, hiring Vicki Kevari and others, and got the community involved in thinking about the Census very early.

It was important that the Michigan Nonprofit Association received significant support, as Kelley indicated. 10 million-plus dollars from State and other monies were made available so we were able to run commercials, to use social media, and do a number of things to try to bring the Census alive to the community and make sure people knew about what was happening. I thought those were all important steps that were made toward the Census 2020.

Chairman PETERS. Thank you. Ms. Garcia.

Ms. GARCIA. I think that one of the things that were real positive, it could have been a lot worse, Senator, had we not had all these people on the ground; it could have been a lot worse. I think that when you look at that aspects, all the work that the nonprofits did kind of picked up the ball where the government was not present here. They are the ones that, whether people like it or not—and there was an undercount, and historically, there's been an undercount, so it's just an issue of trust. You know, the issue

of people did not answer the doors automatically, and during the pandemic, it got worse, people did not come to the doors, so the enumeration was very difficult for the people that were hired for the enumeration.

But I think that all the work that the nonprofits did I think did help, and I think that the issue was like it could have been a lot worse. That is what I keep looking at that aspects. I think the networks that were made between the nonprofits, to know how important because we have been working on this for a long time, to know how important it was I thought developed that network that also brought the Bureau of the Census questions to them, and saying, "Hey, we need this; we need that." It was very late coming.

They used to have an advisory board in Washington, and that was eliminated during the 2020, so there was a lot of things that could have been worse. When you look at that aspect, I think that because of our partnerships, that we may have not gotten the number that we wanted, or the number that we know that we should have, but at least it could have been a lot worse, Senator.

Chairman PETERS. Thank you.

Ms. GARCIA. Gracias.

Ms. FREIJ. For me, Senator, I am a big fan of the resilience and the innovation of communities on the ground, any grassroots kind of efforts where, they need to be celebrated and emphasized. For me, the work of the Michigan Complete Count Committee and our partnership with the Michigan Nonprofit Association, is really truly something to celebrate and to replicate all over the country in the future.

We had some success in this in Michigan. It was truly a partnership between, communities, government, businesses, and private foundations. We all came together and we made sure that we reached out to community-based organizations in 82 of the counties of the 83 counties in Michigan, and we made sure that they are provided with the resources that they need to make them effective at running the educational campaigns and the field work that will allow them to be impactful in engaging the constituencies that they are serving and thus increase the participation response from those communities.

This is something that in my book needs to be celebrated a great deal, and needs to be replicated all over the country in the 2030 Census.

Chairman PETERS. Thank you. Ms. Kuhn.

Ms. KUHN. Thank you. I will just add that one of the big successes for our campaign was the multiple ways for people to fill out the Census. We appreciated the intentional effort to have materials in various language. We found that very helpful. Also, I think it is important to lift up a very great example of some local efforts, keeping in mind that on April 1, 2020, we designated that as "Census Day." Imagine within a few days of the lockdown nearly every planned Census event was canceled, and the effects rippled throughout communities around the State.

In Detroit alone, at least 90 Census promotional events were canceled and replaced by virtual phone banks run by the City's Census captains. With original plans on hold indefinitely, nonprofit organizations changed course. For example, groups began distributing

Census information on flyers through programs such as Gleaners Community Food Banks, community food distributionsites, Meals On Wheels, and Detroit Area Agency on Aging. Along with the Census information, organizations also doled out gloves, masks, hand sanitizers, and social distance reminders to help mitigate COVID-19 transmission in the city, which was devastated by the Coronavirus pandemic.

Chairman PETERS. Thank you, Ms. Kuhn.

I want to continue to talk a little bit about community outreach efforts before we tackle some other important issues. The Bureau certainly seemed to work to forge some relationships through their partnership programs. Some of you have alluded to that in your testimony. They did some targeted advertising in local media. They provided the Census in 13 different languages.

However, I think we all agree, and I certainly have heard this from most of you, that they were slow when it came to providing in-person types of contacts, which are particularly critical for hard to count areas. They were slow to set up assistance centers, especially in those areas with less internet access, which is what we find here, clearly, in the city of Detroit. We pushed the Bureau. We did provide additional funding for those assistance centers; however, I do not think that was ever fully implemented, unfortunately, by the folks who were running that, and it should have been.

But what I would like to ask each of you is that when it comes to community outreach specifically, is there something you would have added that just simply was not done by the Census Bureau that they should have done to help us reach particularly hard to count folks in the city of Detroit as well as other places around the State?

Mayor, what would you suggest?

Mr. DUGGAN. Mr. Chairman, I am going to go back to my time in 1980 as a follow-up response enumerator, knocking on doors in Ann Arbor. Pre-computer, they gave me a stack of blank forms and 300 addresses, and those were my assignments for the week. I went and knocked on doors and neighborhoods in racially mixed neighborhoods in Ann Arbor. Anybody who wants to tell you about the theory about racial undercount, I saw it firsthand.

When the government knocks on the doors of Black and Brown families and wants to know who lives in the house, how much do you make, and what your jobs are, they are more distrustful of the government rep knocking on the door than Caucasians are. That is the truth. There have been a lot of studies to show it.

But I feel like I can relate to anybody. I saw it firsthand, and I do not think the Census Bureau can do it. I think it has to be the groups like these; it has to be the trusted voices. I think it is something that with the exception of the outreach getting stopped by the COVID, we did well. We had every single group in the city; we had trusted voices in the community, at the neighborhood events, and so I do not blame the Census Bureau for that. I think the trusted voice outreach has to come from us. That is where the partnership needs to be. We just want to make sure once the trusted voices say "Do this," somebody actually shows up at the door and takes your information.

Chairman PETERS. Thank you, Mayor. Dr. Morenoff.

Dr. MORENOFF. Yes, thank you. Thank you, Senator Peters. My colleagues on this panel know a tremendous amount about community outreach and can speak from their perspectives much more strongly to this than I can. I am going to take a more expansive view of the question here and talk about community outreach in the form of interfacing between the Census Bureau and local governments.

I want to talk about something called the “Local Update of Census Address (LUCA)” operation which takes place in the years leading up to the Census, particularly in 2018–2019. This was created in 1994 by Congress through the Census Address List Improvement Act, which was really revolutionary at the time. It gave local governments an opportunity to review the address lists that the Census was using to go out and do its enumeration. I can assure you, if we did not have that in place, the results would be even worse.

The problem is that it is only a limited opportunity to review those lists, and that window of opportunity ends before the Census operation begins in around 2019. As the Mayor alluded to in his testimony, we saw that the count that the Census Bureau had in its master address file in 2019 dropped by over 58,000 housing units in the 2020 Census, but we do not know how, because the city or researchers are not allowed to see the updated master address file.

I think that Congress can play a really constructive role here in expanding the LUCA operation, by going back and revisiting that really important 1994 legislation and providing for a more continual partnership between local governments and the Census Bureau in developing and updating the master address file, which could really help lead to a more accurate count and fewer mistakes of the kind that we’re seeing in Detroit.

Chairman PETERS. Thank you. Mr. Anderson.

Mr. ANDERSON. Yes. I will try to say this as succinctly as possible, but certainly seek or maintain community partnerships leading up to the Census, try to maintain the simplicity. And technology could only improve.

What we had this April 1st. The opportunity to go online and within five minutes or less, complete the Census, I would imagine that going forward, that process could be even more simplified.

Ms. GARCIA. Senator, I will go back to the resources. I think that is very important. I did four Censuses. I think of all the Censuses that I did, 2000 was one of the best, and it is because they poured all the resources they could for the accurate count, for the return addresses, the follow-up. They just spent a lot of money to make sure that we had an accurate count. We still had an undercount, but it would have been a lot worse.

I think you have to depend on the resources, and they should start, like, not two years before the next Census, but some sort of ongoing through the whole decade, so that by the time you hit two years before the Census, people are not afraid to at least understand and educate them to understand why they have to fill out the Census, and how important it is to their community, whether

they put up a new school, or they put up a new clinic. I think that that is something that is very important.

We deal with migrants, and migrants come and go, and we want to make sure they are counted where they are living at at the time of April 1st. Those are the things that I think needs to be in place so that we can improve how our numbers are for the State and how much resources will come back for the next 10 years.

Ms. FREIJ. For me, I want to reemphasize how Mayor Duggan answered this question. We know that the Census Bureau is a professional institution with very talented scientists who put together the digital tools and the data security tools, and developed scientific kind of tools that were provided to our communities.

The only issue is that the dissemination of these resources cannot and could not be done in an effective way by those professionals. There is a need to depend on community-based, trusted voices that can take these tools and make sure that they are disseminated to the actual participants and communities that these organizations serve.

Ms. KUHN. I will add a couple things. I would consider starting earlier with the partnership specialists in communities. Some communities, they were very successful, and others, we had not so much success. Also, when thinking about that as the Bureau gears up for 2030, they should take into consideration maybe more ethnic Census field workers to create greater trust in these communities, as many of us have said on the panel. Last, we would also like to see a stronger role for ethnic and nontraditional media in the overall communications plan, especially for small media outlets. Michigan has a robust network, which is an asset. Not many other States have that, and we should take advantage of their trust and reach in community.

Chairman PETERS. Thank you. I have a more directed question here, just to Ms. Freij, related to the Arab American population and some of the unique challenges of counting that community. I have certainly been fighting for a long time to have a separate category for people of Middle Eastern and North African descent, which we call the MENA category.

We were making some real progress with a long fight up through 2016, until the Trump administration basically put a halt to that and ended that program. We are continuing to fight, however, as you know. I am happy to say that OMB has now elevated this as a priority, and in June announced that they are going to begin the process to revise these standards, which I think are very encouraging.

Ms. FREIJ. Yes.

Chairman PETERS. But I would like to have you speak on the record as to how do you believe that OMB including the MENA category in the standard is going to help not only the Census Bureau but also other Federal agencies collect more accurate and more inclusive data that we need in order to make sure we deal with the unique needs of this community.

Ms. FREIJ. Thank you so much for this question, Senator. As I said earlier, we remain hopeful and expectant that the OMB will move to establish a MENA category across the Federal Government when they revise the Federal standards for data on race and eth-

nicity. Our expectation is due in large part to your strategy support for the civil and human right of our community to statistical recognition and political representation. Thank you very much for your leadership, Senator.

There are two ways we think that a MENA category will help all Federal agencies collect more accurate and inclusive data. First, the Census Bureau already tested the practical utility and statistical validity of a MENA response category. In the 2015 national content test, they found it captured the survey responses of those in the MENA working definition. It did not capture the responses of those who could have thought they were MENA, but were not in the working definition, and it made more individuals, particularly Black and Hispanic individuals, sure of their self-identification.

These findings cast into stark reality that the MENA category is just a good statistical category, and it resonates with a discrete population that is conscious of itself in its terms. It is unambiguous, and it improves Census response rates.

Second, through the direct service work of ACCESS and other MENA community serving organizations within the national network for Arab American communities, we have observed that individuals of MENA descent tend to share certain characteristics not yet captured in Federal data, namely individuals of MENA descent tend to have limited English proficiency, limited access to capital, poor or desperate health outcomes, and barriers to establish pathways to sustain and inter-generational academic and professional achievement. A MENA category would allow the litany of Federal policies and programs that rely upon racial and ethnic data to recognize and address these conditions in their authorized activities.

In conclusion, a MENA category provides for more accurate and inclusive data from a statistical perspective, and increases the use-value of statistical products across all Federal agencies.

Chairman PETERS. Thank you.

The Census Bureau has now released some key Census results, including undercount data. Despite the previous administration's interference, which all of you have referred to, the career officials certainly persisted to take some time to process the data, and they have also released many studies about the quality of that data, as you know. Unfortunately, the data have revealed nationwide undercounts for many groups, especially minorities.

I think the Mayor alluded to these numbers—in your testimony, Mayor—Black people were undercounted by three percent, Latinos by nearly five percent, which is three times the 2010 undercount. There are also undercounts for Native Americans, Asian Americans, young people, people who rent their homes, and so much more. The Bureau unfortunately does not tabulate local level undercounts, and has serious implications for Michigan and some of our communities.

Dr. Morenoff, I am going to start with you. You have described your study on the likely undercount here in Detroit. My question to you is how does this compare to other cities? How does this fit into the national undercount data that has now been released by the Census Bureau?

Dr. MORENOFF. Yes. Thank you, Senator Peters. Thank you, also, for emphasizing the need for more local data on these metrics for how the Census is performing, the post-enumeration survey, in particular. First, in some ways, the problems that were encountered in Detroit are emblematic of national trends. In other ways, it is really unique. Let me start with the commonalities.

I see at least three commonalities. One of them you have already referred to, which is the undercounting of Black and Brown people, and the Mayor already gave you their specific numbers. Another group that maybe receives less attention than it needs to is households that are renting housing are undercounted relative to households that own their housing. Detroit is a majority renter city, so that is important to emphasize.

Then the third one is one that I have already referred to, but I will say again, that areas with lower self-response rates tend to get undercounted relative to areas with higher self-response rates. Detroit was last in terms of the top 50 cities in its self-response rate. These are all ways that Detroit fits into the national pattern, but they are also very important ways where it is a unique anomaly. I provide a lot of this data in my written testimony.

But when you look at a comparison of say the 50 largest cities, and look at the population loss, the nearest comparable cities are places like Phoenix, San Antonio, Miami. What those places have in common are very large proportions of foreign-born populations, and Latino populations, in particular. I am not saying this is not a factor in Detroit, and it certainly is. But not to the extent that it is in these other cities where probably the kerfuffle over the introduction or the proposed introduction of the citizenship question and the profound distrust that developed as a result of that had really profound effects on the undercount.

What makes Detroit distinct is that among all these cities, it was the only one that experienced not only a severe drop in its population count, but also an even more severe drop in its housing count. I think this is important because some other people might say, "Well, maybe this was just a result of the pandemic and people leaving the city." There is two reasons why I do not think this is an explanation for what happened in the 2020 Census.

One of them is that if you look at national trends, the cities that lost the most population due to the pandemic, that happened in the subsequent year, 2020 to 2021. The second reason is that the pandemic might provide an account for why people are leaving cities, but it does not provide an account for why housing units are being dropped from the books, and that is what is happening in Detroit. This tie-in to the population undercount being hidden by the housing undercount really points to some unique circumstances that I think are really more reflective of the field operations that were not going out and counting enough people in these housing units.

Chairman PETERS. Thank you. Actually, I have been reviewing this excellent report you put out, "The Analysis of the Census 2020 Count in Detroit from the University of Michigan," December 2021. This is an incredibly comprehensive document that really takes a look at the undercount that occurred here in Detroit, and how significant it is, and reasons. I am going to enter this into the Congressional Record (CR) here from the hearing so that we can refer

to that. But I certainly want to applaud the work that the University of Michigan has done on this issue.

Dr. MORENOFF. Thank you so much, Senator Peters. I and my colleagues greatly appreciate that.

I know it was a group effort, but we appreciate everybody.

Mayor Duggan, as we have discussed, the study that we are entering into the record here shows undercounted households in some Detroit neighborhoods by as much as 8.1 percent, over eight percent. We know Detroit is home to many of the groups that has been discussed that are undercounted on the national level, majority African American city, high percentage of renters, diversity. But I think it is important for this Committee and for folks to realize what the impact of this undercount will mean to the city of Detroit, why we have to get this right. This certainly has significant implications. Could you explain on the record for why we have to get this right?

Mr. DUGGAN.

We have been cut already, \$10 million a year nearly in State revenue sharing for police, fire, and other services and virtually every aspect of the Federal Government from housing to hot lunch to Medicaid funding is driven by it. Here is to me the most interesting thing about what we have seen: I have noticed with interest that the Pentagon has acknowledged the possibility of unidentified flying object (UFOs) and has started to study them.

To me, the Census Bureau numbers in Detroit are even more remarkable. They have proven the existence of ghosts, because DTE has 280,000 housing units that are paying their light and gas bill, and the Census Bureau says we have fewer than 255,000 households. Who is occupying those other 25,000 households, paying the gas and light bills? There is two possibilities; we have either been invaded by a group of ghosts, or the Census Bureau data is wrong.

Senator, all I keep asking for is the same thing. If we can have an appeal process where we can bring in objective data, like the University of Michigan report that you just entered into the record, no reasonable person will conclude that our number is correct.

Here is the thing that aggravates me: Why are we a year and a half later? It is not that complicated. You write something that says, "If you believe you were undercounted, here are the kinds of outside objective evidence data points that you can present, and we will consider them." With the annual estimates now, there is even less defense.

Here is what they do when they jump from 2021 to 2022—there is no privacy involved—they run a math calculation; birth rates, death rates, permits, how many people filed income taxes, how many people were on Medicare. It's a straight calculation. There is no way in the world 7,000 people left the city of Detroit in the last year.

There is nothing secret about that calculation. Have them put the calculation out there and let us then objectively—I do not want any special treatment. All I want is to show you clearly and objectively what we have, but there is no urgency. If I were a banker sitting in front of your Committee with clear evidence that we had discriminated racially among the people that we are making loans

to, you and Congress would be outraged and demand immediate action from the Federal Government.

We are sitting here a year and half later with people being discriminated against because of their color in the city of Detroit, and the Census Bureau has not even put out an appeal process. It is time we hold our own government to the same level of urgency to address racism that we would for any private company. I am hoping that is what comes out of this hearing.

Chairman PETERS. Absolutely, Mayor. There is no question we have to get this right. As you said, it is not special treatment; it is just being treated fairly, make sure you count every individual that is there. In hard to count areas, these are folks who need to be counted, without question. As you know, we have been fighting this for some time, and certainly believe that State, local, tribal governments all need to have the equal opportunities across the country to challenge the Census where it is appropriate, and where there is objective data to back up their assertions. I pushed to create some of these programs.

After my advocacy last year, the Bureau has created a The Post-Census Group Quarters Review program, which does allow localities to submit new data for missing group quarters, like nursing homes, colleges, prisons, that data is going to be part of the annual population estimates, as you know, and which is a basis for central funding.

Mr. DUGGAN. A good step in the right direction.

Chairman PETERS. We have taken that first step, but like all good solutions, they usually require more than one step, but it does not start until the first step. We have started it with the first step, and we are trying to push the Bureau to expand the Population Estimates Challenge Program to give you more opportunities to have that input for the data.

My question for you, Mayor, is how has the City participated in the existing program to help with the undercount, including the Count Question Resolution program and this new Group Quarters Review program? Do you believe that will provide some help for residents?

Mr. DUGGAN. Yes. I would defer to Professor Morenoff, who is more into that. But we have filed an appeal on that. We do believe that there are such clear mistakes on that. We will get some relief from that. It actually only allows us to appeal a small part of the problem. Professor Morenoff could probably describe the appeal better than I can.

Dr. MORENOFF. Yes. The Mayor is referring to the Count Question Resolution program, which allows local entities to challenge the results of the decennial Census, the 2020 Census. The problem is that the grounds on which you can mount those challenges are very narrow. There is only two types of challenges you can mount. One of them is what they call "boundary issues." That is when you are contesting, like, the geography of where a certain housing unit was counted. We thankfully did not have many of those issues in Detroit.

The other one are housing issues, and we did have a lot of those in Detroit. The way to challenge the population count is through challenging the housing count; that is the way that the Census sets

it up. That is what led to that extensive auditing of housing that we did. I worked with folks at the city to help run that process, and we did an extensive look at all the housing units on a set of blocks that we were challenging. That process is now in operation; it is being reviewed by the Census. But as the Mayor points out, what is really important in looking forward, in addition to the Group Quarters challenge, which is a critically important new addition to this process, and was also something that we are in the process of working on and through a lot of groundwork now, my colleagues have found, hundreds of people living in group quarters beds that we think were unaccounted for in the Census, so that challenge is forthcoming.

There's also going to be a challenge, we hope, to the Population Estimates Program, but we need the census to reinstate that program, and to also expand the way that it allows for challenges to occur, because there are some nuances to those rules that are frankly that kind of handcuff local governments. Like for one them, it's called the "County Capital," which is that if Detroit wants to challenge its population count, the Census Bureau might adjust the population estimate, but only in a way that the overall population for the County doesn't change. So adding more people to Detroit would mean taking people away from the rest of Wayne County, and that is just patently not the way to go about this. It's absurd.

Chairman PETERS. I would like you to expand, if you would. You have these existing options that you're pursuing now. But specifically, what should the Census Bureau do right now to provide an opportunity for the city of Detroit and any other community in the State of Michigan to challenge the count? What specifically? And this is both to the Mayor and to Dr. Morenoff both.

Mr. DUGGAN. We would like a very clear process that says, one, you can challenge the decennial Census, the 2020 census. We know we cannot project ourselves back in time, which is what makes challenging Census counts from April 2020 so hard, but that we can present outside objective data. Director Santos has already said the count was wrong.

All I want is a chance to present objective data of what was right. It could be things like housing permits; it could be things like inspections; it could be things like the University of Michigan door-to-door study; it could be things like DTE's records on electricity. What we would like the ability to do is say, "Here is what we think the accurate count is. Here is the object"—and you can verify. It is not us complaining.

Then on the annual estimates, which in some ways may turn out to be more devastating to us, because they affect our Federal money every year, make the formula public, and let us challenge that with objective data. That is all we want is transparency and the ability to present objective data. Professor Morenoff can talk more about the data we want. But we do not want to do anything except objective verifiable data to challenge those numbers.

Dr. MORENOFF. Yes. I really do not have much to add to that. I think the Mayor put it very succinctly. We do need more transparency and the ability to marshall the appropriate types of data that the Census Bureau will look at and match up to their data, and really provide a fair comparison between what they counted

and what we see as objective evidence of the number of people and the number of housing units in the city. I continue to work with the City to try to marshal as much of that administrative data as we can, things like building permits, demolition permits.

We are trying to make sure—and I think every city—unfortunately, this process places a huge burden on cities to kind of do this on their own, and it would but and helpful if the Census shared more of its own data with cities. I have just been thoroughly impressed, but also astounded by how much time and effort the City has put into this process. I do not know that many other cities have that same ability to mount this kind of a challenge. That is not the way the system should work. It should be open for all cities to kind of examine the data, and to challenge it if it is found to be inappropriate.

Mr. DUGGAN. Mr. Chairman, think about how easy this would be in simple terms. We do not want the Census Bureau to disclose the personal data of which houses were occupied. I think the protection of privacy is critical for future Census count. But think about the Boston-Edison neighborhood, 500 houses in that neighborhood. The Census Bureau says 399 were occupied, the Post Office says 480 were occupied, our door-to-door survey says 486, DTE probably says 470.

What I would like to do is be able to hand the Census Bureau the DTE data, house by house, which ones are occupied, the Post Office data, house by house, which ones are occupied, and our door-to-door survey data, house by house, which one is occupied. They can match that up against their own Census data and they will see that houses they say are empty, the postman's delivering, the lights are on, and the door-to-door surveyors found people in there. That is going to be an occupied house. It would not be that hard, if we were to give that data to the Census Bureau, for them to match it against their actual count, and see where the undercounts are.

What we are asking for is not complicated in today's world, but it requires them to have the willingness to do something they have never done, which is admit their count is not the most accurate, and consider multiple, objective, verifiable sources from the outside.

Chairman PETERS. It is really very reasonable, and we will make that request. I will be talking to the director, and we are going to be talking about what we have learned at this hearing.

We are running out of time, so I just maybe will throw out—and anybody can jump in on this—just some final thoughts that you would like to leave this Committee with, and know that those thoughts will be delivered to the Census Bureau and could possibly translate into legislation or other activities that are taken. I am going to start down—and you do not have to jump in if you do not like, but we will start with Ms. Kuhn, because I am in the great city of Detroit, and the Mayor of Detroit always will get the last word when I am in the city of Detroit.

Ms. KUHN. Sure. A couple of last thoughts. Having had the opportunity to hear Census Director Robert Santos speak, we are encouraged by his approach and lived experience with the communities we work with. Also, we will encourage the Bureau to start

early with ethnic communities and work with trusted allies already in community to better understand the people and their needs. We also support the Bureau having a sufficient budget to carry out its work, as we've talked about here today.

We also would like to see the Census revisit the race/ethnicity categories to be more inclusive of identities that are not white, and I am thinking more specifically of the MENA designation. Finally, we would like to see more transparency on Census tract completion rates for outreach purposes, as we have talked about. Those are our final thoughts.

Ms. FREIJ. For me, the final thoughts I would like to make everybody know is really for this Committee to deal with the elephant in the room, the importance of protecting the science mission of the Census Bureau and its independence from any political interference is something that we need to pay attention to, and we need to make sure we build the safeguards that will accomplish that. Of course, ensuring there is adequate funding at all levels to allow the scientists to come up with the tools that are needed to have a successful count and to be able to invest in resources within the local communities that will ensure an accurate count, especially in the communities that are very hard to reach.

Ms. GARCIA. Senator, one of the things that I think would be really important to know is that the challenges from the cities, some urban cities like Detroit who have been challenged in the past—Coleman Young actually sued the Census Bureau, and they did come back with a more accurate count. I think they had lost like 50,000, and they were able to bring it back. I think some precedence had been set, even though it is timely, costly. If there is another way to do it, by an appeal process that is opened, beginning and end, would be real important when we look at moving forward, because we are hampered with these numbers for 10 years.

Even the estimates, it does not have that much of an impact—they can say, “estimates,” but it doesn’t say, “census numbers.” I think that that would be something at least that you, as our Senator, could actually advocate that we have an appeal process, because there is so many people that are not happy with the count.

Thank you.

Chairman PETERS. Thank you. Mr. Anderson.

Mr. ANDERSON. Once again, Senator, I want to say thank you for this opportunity to participate in this hearing. I would add that the Urban League would support, as the Mayor has been talking about, and Professor Morenoff has been talking about to extend more flexibility in how you review local challenges to the 2020 Census count. It seems logical and common sense that if the household count that they have is significantly different than the one that the utilities have, that you could make some adjustment and accountability.

One other point I want to make is one that I mentioned during the testimony that States like Illinois, California, Colorado and others have legislation—they have ways of allowing prison data, prison counts, to enhance the local community count. In Michigan, that would require the State legislature to pass legislation that abolishes prison gerrymandering, but I think that is something that as a community in a State that—particularly those residents in the

city of Detroit that want to advocate to happening before the next Census takes place.

Chairman PETERS. Thank you. Dr. Morenoff.

Dr. MORENOFF. Yes. Thank you. First I am going to underscore the point that the Mayor, in his last comment about ways that the Census Bureau could allow local governments like Detroit to clearly bring data on each specific address in the city that it feels a challenge is necessary to line up against the Census data.

One thing I neglected to emphasize in my prior comment, is right now, we are allowed to bring data to challenge the existence of the housing structure, but we are not allowed to challenge the occupancy of that structure. We also have data that speak to the occupancy, and that data should be brought to bear, to do that kind of comparison that the Mayor was talking about.

Also, from a researcher perspective, there are two things I want to end with. One of them is a point that Senator Peters already made, which is like the Census conducts a very thorough post-enumeration survey after the Census is done to evaluate gaps in the coverage, and it would be super helpful if those results could be made available at a more local level, so we can see whether national trends apply to Detroit and other local entities throughout the country, and how the areas and the coverage might be different in those places.

This is a point that is made by the Task Force on Census data quality at the national academies. The Census, in part because of all the innovations it is introduced, has a lot more really nice operational metrics now that allow researchers and evaluators to kind of dig deep into how the Census is conducting its operations. Those measures should also be shared at a local enough level that we can see things like—how much of the non-response follow-up effort was happening in Detroit? How many of these cases were being sent out to in-field address canvassing instead of just in-office address canvassing, which is happening behind a computer screen?

But, how many people are actually going out into these neighborhoods? How many of these cases are being resolved by resorting to proxy interviews, trying to find other people in the neighborhood to talk to about whether a given housing unit was occupied on Census day versus actually knocking on the doors and talking to the people directly. These are all metrics that the Census Bureau is working on, but they have to be released at a fine grain enough level for us to really understand what is happening in these local areas.

Chairman PETERS. Thank you. Mr. Mayor

Mr. DUGGAN. Mr. Chairman, I am going to start by thanking you for taking the time to hold this important hearing locally so that the community can participate.

I will just close by saying this: We have an administration in the White House that is committed to its core to racial justice. There is no question about that. We have leadership in the U.S. Senate and the U.S. House right now that have proven over and over again by their actions that they are committed to racial justice. We have leadership at the Census Bureau that does not seem to have any urgency to correct the racial inequities that are there.

It is my hope that what comes out of this hearing is that the values that are shared by the Biden administration and by you and your colleagues in the Senate, and your colleges in the House, that we put a spotlight on the Census Bureau, and get some urgency, and just give us a chance to present some facts and appeal. That is all I want. Thank you.

Chairman PETERS. Thank you. Thank you, Mayor. I want to thank all of our witnesses. Thank you for being here today, and for offering your testimony. The information that you have provided will certainly put the local perspective on the record as we address challenges that the Census Bureau faces today, as well as tomorrow, and kind of better understand the challenges that communities across our State feel.

But clearly, here in Detroit, in particular, a significant challenge, that must be addressed. You are absolutely right, Mayor. This is something that must be addressed. The nice thing about what I have heard, the way to address it is actually common sense. It is nice when you can put those two together. Sometimes that can provide a challenge for us to actually get it done, but clearly, it is common sense. It is about making sure that the data actually is accurate and can be substantiated in an objective way, and not asking for any special treatment, but making sure that everybody is indeed counted.

The Census is only conducted every 10 years, but I think we can all agree that it impacts people's lives each and every year. This has a significant impact, as we talked about in my opening comments. I am going to continue, as Chairman of this Committee, to provide oversight on the Census Bureau, and leadership on the Census issues, and we are going to build on what we have learned here today.

I look forward to continuing to work with each and every one of you, as well as the Census Bureau, so we can address undercounts, improve future Census. This should not happen in the future. Let us fix it and understand where the vulnerabilities are so we are not back at this a few years from now, dealing with the same issue, and make sure that every Michigander gets the support that they deserve.

The record for this hearing will remain open for 15 days, until 5 p.m. on August 9, 2022, for the submission of statements and questions for the record.

This hearing is now adjourned.

[Whereupon, at 11:45 a.m., the hearing was adjourned.]

A P P E N D I X

**Chairman Peters Opening Statement As Prepared for Delivery
Full Committee Hearing: Reviewing the 2022 Census: Local Perspectives in Michigan
July 25, 2022**

Today's hearing will examine the 2020 Census and its operations and impacts in Michigan, as a local case study that illuminates national trends.

I want to acknowledge Congresswoman Brenda Lawrence, whose district we are in today, who has also been a champion on census issues and a key partner. Throughout the census, Congresswoman Lawrence has also fought to ensure every person is counted, and we continue to work together on these issues. She has sent us a statement for today, and without objection I will enter it into the hearing record.

I look forward to hearing from our witnesses today about your communities' experiences with the census, including successes and challenges during the count, your incredible public outreach efforts, the concerns we are now facing with undercounts of our communities, and lessons learned for the 2030 Census.

While my Committee has examined these trends at the national level, it is essential to get local perspectives, since the impacts are felt here at home.

Every ten years, the census serves as a national roadmap, determining how billions of dollars in federal resources are dispersed, as well as Congressional representation. The census affects everything from school funding and classroom sizes, to money for road construction, to where businesses decide to locate. In Michigan, at least \$1,800 in federal funding per person is on the line if there is an inaccurate census count.

Every census is a monumental task, and the 2020 Census proved especially challenging due to the public health crisis caused by the COVID-19 pandemic, and attempts by the former administration to politicize the census, which compromised the collection of critical data.

Census Bureau professionals ultimately resisted political interference and have worked diligently to deliver census results in 2021 and 2022. And community groups in Michigan, met the moment, with historic and robust efforts to help people get counted. I believe these "get out the count" efforts, and your work, serve as a model for the nation.

Under the new Census Bureau director, Robert Santos, who my committee confirmed last year – the Bureau is working to be transparent about 2020 Census results and challenges, determine what improvements can be made, and help communities move forward.

As Chair of this Committee, which has jurisdiction over the Census Bureau, I led oversight throughout the count, fought against political interference, and consistently pushed the Bureau to improve its efforts to count all Michiganders, particularly in "hard to count" communities.

While we won many victories for an accurate census, there were also many aspects that fell short. There were significant undercounts of minorities across the nation, as well as young children, renters, and other disadvantaged groups.

And according to scholars at the University of Michigan and Wayne State University, the 2020 Census likely undercounted Detroit's population by about 8% in certain neighborhoods, a potential undercount of tens of thousands of people.

This translates into real challenges for cities like Detroit, leading to decreased funding for services like Medicaid and Medicare, SNAP benefits, Head Start, and more. I look forward to hearing from our panel today about how residents in Detroit and other Michigan communities would be hit hard by these results, and the efforts led by Mayor Duggan and other critical organizations to address them.

As we examine ways to improve the census for our communities, we must also discuss how current categories limit representation for Michigan's Arab and Muslim American communities.

Currently, the census does not include a designation for people of Middle Eastern and North African descent, which means this vibrant community may not be receiving the right federal support and resources to meet their unique needs.

For years, I have been urging the Office of Management and Budget, which sets all federal data collection standards, including for the Census Bureau, to add a specific MENA designation to ensure this community is accurately counted. I look forward to discussing how this additional category will help communities here in Michigan.

Today's hearing is an important opportunity to put our distinguished panel's perspectives on the 2020 Census into the record, and identify solutions that will help us move forward, and support every Michigander.

Senate Committee on Homeland Security and Governmental Affairs
“Reviewing the 2020 Census: Local Perspectives in Michigan”
Monday, July 25, 2022
Representative Brenda L. Lawrence - Statement for the Record

Chairman Peters, Ranking Member Portman, and Members of the Senate Committee on Homeland Security and Governmental Affairs:

On behalf of my constituents in MI-14, I want to express my appreciation for holding this important field hearing examining the 2020 Census and its impact on our local communities in Detroit, Michigan.

The implementation of the 2020 Census faced a series of challenges, most notably a pandemic that was especially devastating in communities already at risk of being undercounted. Undercounts have alarming consequences for cities like Detroit, whose population is nearly 80 percent African American. Because the census is the baseline for annual population estimates that guide the allocation of federal assistance for states, localities, individuals, and families, undercounts can deprive cities like Detroit of their fair share of vital public resources for the next decade - financial resources for food assistance, education, healthcare, housing, and so much more.

As a Member of the House Committee on Oversight and Reform, my colleagues and I have worked to address the challenges related to the 2020 Census count. In early 2022, the Committee sent a letter to Census Bureau Director Robert Santos requesting information on whether the agency is looking into reported 2020 Census undercounting in Detroit, Michigan, and other diverse communities; the Bureau’s analysis of the potential undercount in Detroit and any steps being taken to address it; and any steps communities can take to challenge and amend their population counts when an undercount has occurred.

As a Member of the House Appropriations Subcommittee on Commerce, Justice, Science, and Related Agencies, I worked in partnership with Senator Peters and Census stakeholders to request report language for the Fiscal Year 2023 appropriations report to expand the scope of the Populations Estimates Challenge Program in order to create a more effective way for local governments to improve the accuracy of their annual population numbers.

The field hearing is critical to determining what more the Census Bureau can do to support Detroiters and Michiganders across the State. I thank Chairman Peters for the opportunity to submit this statement for the record and look forward to working with him, Mayor Duggan, and the panel experts to mitigate the harm caused by the census undercount. We cannot allow our communities to be deprived of crucial resources for the next decade.

TESTIMONY OF

THE HONORABLE MICHAEL E. DUGGAN
MAYOR, CITY OF DETROIT

**“Reviewing the 2020 Census: Local Perspectives in Michigan”
Senate Committee on Homeland Security and Governmental Affairs
July 25, 2022**

Good morning, Chairman Peters. I appreciate the opportunity to testify today, and I ask that my full written statement be entered into the record.

Tens of thousands of Detroiters were not counted in the 2020 Census. This is not my *opinion*; it's a *fact*. The *fact* of this undercount has been documented by a research team led by experts at the University of Michigan and Wayne State University. Through their efforts, we've confirmed that the 2020 Census failed to count thousands of homes in the City and the people living in them. And even when they did count a house, in an extraordinary number of cases, they wrongly determined that it was vacant.

It didn't have to be that way: all sorts of red flags let the Census Bureau know that it was poised to undercount Detroit. But the Bureau failed to heed those warnings, and, instead, actually took actions that made things worse.

The undercount of Detroiters has an enormous impact. Since 2010, Detroit has received more than \$3.5 billion annually in federal funding tied directly to the census count. With an undercount in the tens of thousands, Detroit will be short-changed hundreds of millions—or even billions—of federal dollars.

Compounding the problem, under existing Census Bureau rules, there's no effective way to undo the damage. The Census Bureau won't go back to correct the 2020 count no matter how much evidence we present. And they will only make adjustments to future population estimates in very limited circumstances. This is why we come to Congress. It's too late to correct errors in congressional apportionment. But, it just makes sense that when there is solid evidence that the census undercounted Detroit's population—as there is here—that error should be corrected, to ensure that Detroit receives its fair share of public funds.

Here are the facts. The 2020 Census counted 639,111 people in Detroit and 309,913 housing units. We dug into those numbers. Detroit has records of how many houses there are on each City block—records for fire and emergency services, water service, and for building inspections. We update those records when new houses go up, and

when old ones come down. The US Postal Service has records of houses in the City, too.

When we compared our records and the Postal Service's records to the number of housing units the census counted, the difference was shocking. They missed tens of thousands of houses in Detroit. This isn't rocket science: all they had to do was follow the postal carrier and they would have found those homes. I have direct experience with this. In 1980, when I was a student, I worked as a census enumerator in Ann Arbor. You put in the hours, you pound the pavement, you count the people. The 2020 Census simply failed to put in the work in Detroit.

We didn't stop our investigation with administrative records. We looked at actual images of all of the addresses on 2,990 City blocks where there appeared to be an undercount. A team of reviewers from the University of Michigan, Wayne State University, and the City, working with nationally-recognized demographic experts—more than 100 people in total—collectively spent over 5,000 hours examining photographs of 114,274 addresses.

We looked at Google Street View images. We also used street-level imagery from the City's Department of Innovation and Technology, and we used 360-degree aerial imagery from the City's Assessor's Office. We used two images for each address: one closest-in-time before April 1, 2020, and one after—all to determine whether our records, and the Postal Service's records, were right.

Here's what we found. On those 2,990 blocks, the census missed 9,334 habitable housing units—houses and apartments that they just didn't count.

Of course, the census isn't just about counting housing units—it's about counting people. So, we applied the Census Bureau's own vacancy rate for the City to those 9,334 houses. Then, we used the Census Bureau's City-wide average for the number of people living in a housing unit, which is just under two and a half. Taking this very conservative approach, the 2020 Census missed *at least* 18,900 people in Detroit.¹

But, the real number is much higher.

¹ The City of Detroit's March 30, 2022 Count Question Resolution ("CQR") submission and June 30, 2022 Supplemental CQR submission, which document the City's housing count analysis and conclusions, are attached to this testimony as Exhibits 1 and 2, respectively.

First, we examined only a portion of the city blocks with housing units on them. We have finite resources, and limited time. But I have every reason to believe there were thousands of houses missed elsewhere.

Second, and just as important, we know that in many Detroit neighborhoods the 2020 Census significantly over-stated the vacancy rate for the houses they did count. Professor Jeff Morenoff from the Gerald R. Ford School of Public Policy at the University of Michigan will talk about this in more detail later. His research team looked at the 2020 Census count of *occupied* housing units in Detroit, going door-to-door in five neighborhoods to count how many houses were occupied, and additionally reviewing Postal Service records in five additional neighborhoods. They found that the census undercounted the number of occupied housing units in those neighborhoods by more than 8%. They concluded that “if undercounts of a similar magnitude [were] found in a majority of the City’s more than 600 block groups, the ultimate size of a potential undercount could be in the tens of thousands.”²

We also took a step back from the detailed work of documenting missed housing units neighborhood by neighborhood to look at the bigger picture. At the start of the Local Update of Census Addresses (“LUCA”) operation in 2018, there were 368,417 residential addresses in Detroit, according to the Census Bureau. Detroit participated in the LUCA program, submitting addresses to add and delete from the Bureau’s Master Address File. At the end of the LUCA process in 2019, there were just over 385,000 addresses for Detroit in the Bureau’s Master Address File.

Fast forward through 2020, the census year. In August 2021, the Bureau released detailed population and housing unit counts in its Redistricting Data File. The numbers for Detroit were shocking: the address count for the City was only 309,913.

So, I ask the Census Bureau: how did we “lose” 58,000 residential addresses between the start of LUCA in 2018 and the end of the 2020 Census? When, and how, did those tens of thousands of addresses disappear from the enumeration universe?

Our start-to-finish numbers paint a stark picture of the problem for Detroit: where did those housing units go? We would be grateful for answers from the Census Bureau to these questions, and we welcome the committee’s assistance in facilitating that exchange of information.

There’s one question, however, that’s no mystery: *why* did this happen? It happened because the Census Bureau failed to provide enough resources in Detroit to do the

² The University of Michigan report is attached as Exhibit M to the City’s March 30, 2022 CQR submission.

job right, and they ended the count prematurely. We saw this coming and sounded the alarm long before the numbers were reported, but our pleas fell on deaf ears.

The 2020 Census was the first time the Bureau began the count by prioritizing online internet self-response. From the outset, it was obvious that internet self-response would present a serious obstacle in Detroit, one of the “least-connected” big cities in the country. It was no surprise, then, that Detroit’s self-response rate was dead last among the 50 largest cities in the United States.

But, in August of 2020, when self-response was only 48.8% in Detroit compared to 77.2% in neighboring Oakland County, the Census Bureau actually started its field activities in Oakland County *before* Detroit. To make matters worse, after first admitting that COVID-19 necessitated an extended timeline for completing the count, then-Commerce Secretary Ross reversed course and ended all counting operations early—on October 15th.

As a result, enumerators had only 50 days to count over half the homes in Detroit. And during those 50 days the Bureau refused to devote enough resources to the City.

Here are just a few examples of the Bureau’s mishandling of the Detroit count:

- From early July until August 30, 2020—the critical period for field operations in Detroit—the Detroit Area Census Office had no director.
- Despite the clear need, census enumerators who offered to work in Detroit were turned away. Mary Kovari, an educator and census enumerator, said: “By late August, the work in Oakland County began to slow down. On three separate occasions I volunteered to work in Detroit, but I was never assigned any cases to work.”
- Census supervisors actually diverted enumerators *away* from the City. Josh Samson, a census enumerator, said: “Instead of being sent to Detroit, I was assigned to areas all over the state . . . I was [also] offered a \$500 bonus to travel to another state to work, but I never got a call back about working in Detroit.”
- Clois Foster, a retired postal worker and census enumerator, added: “They even asked me to go out of state. How can I go out of state when my own City is not being counted?”
- As the counting process drew to its premature close, some enumerators who remained in Detroit were not assigned any additional work. Brenda Jett, a

retired Detroit Public schoolteacher told us: “Near the end of the count, the case assignment list was not being updated . . . I did not receive any new case assignments for the last 5 days before the count ended.”

- Enumerator Josh Samson summed up: “I took my job seriously and did not want the citizens of Michigan to be undercounted. The entire process was a mess.”³

This must be corrected.

Detroit is pursuing all administrative remedies currently available, but the Census Bureau’s procedures are too limited to provide meaningful relief. For example, the City filed a Count Question Resolution submission, challenging the undercount of housing units in the City. But that program only addresses geographic coding issues and “processing errors” that resulted in incorrect housing counts. There’s much more than a “processing error” here.

At a minimum, the City’s population count needs to be corrected in the Census Bureau’s annual population estimates going forward. But here again there are obstacles.

First, in decades past, the so-called “Population Estimates Challenge Program” allowed cities to challenge an incorrect population estimate beginning in the year following the decennial census. This year, the Bureau has delayed implementation of that program, preventing challenges to the 2021 estimates.

Second, the rules governing the program following the 2010 Census were so narrowly written that they prevented real adjustments, even when a challenge was backed by compelling evidence. It is time for the Bureau to adopt a much more robust challenge program. At least three issues should be addressed:

- (1) cities should be allowed to challenge the population “base” used for the annual estimates, especially with respect to housing vacancy rates and person-per-household figures;
- (2) the “county cap” that artificially restricts adjustments to a city’s population should be eliminated; and
- (3) cities should be allowed to challenge the “change components” used in the population estimate with the best available administrative data.

³ Signed statements from eleven census enumerators and staff are attached as Exhibits B – L of the City’s March 30, 2022 CQR submission.

Finally, Mr. Chairman, I want to thank you for asking the Senate Appropriations Committee to include report language with the Fiscal Year 2023 appropriations bill that funds the Census Bureau, urging the Bureau to improve and expand the Population Estimates Challenge Program. The House Appropriations Committee recently adopted the language, and we are hopeful that the Senate committee will do the same.⁴

We know we can't go back and fix the 2020 Census or replace hundreds of millions of dollars in federal funding already lost, but we hope that, with your help, the Census Bureau will take positive steps to give our City much needed relief going forward. At a minimum, Detroit needs the Bureau to implement a more robust Population Estimates Challenge Program—*this year*—to correct the City's population for future estimates, ensuring Detroit receives its fair share of federal funds.

⁴ The report language in the House Appropriations Committee Commerce, Justice, Science, and Related Agencies Appropriations Bill for fiscal year 2023 states: "The Committee is concerned over the accuracy of the 2020 Decennial Census and the impact the Department's unprecedented engagement in technical matters with the Census Bureau during the years leading up to the 2020 Decennial may have had on the efficacy of response rates. The Committee directs a briefing from the Census Bureau, in coordination with the Scientific Integrity Task Force, no later than 45 days after enactment of this Act on steps it is taking to minimize interference in the 2030 Decennial Census. Additionally, the Committee recognizes that pandemic-related disruptions to the 2020 Decennial Census operations may have resulted in significant undercounts in some localities. The Committee notes that decennial census counts are the basis for annual population estimates that are used to distribute Federal resources, and therefore, those estimates should be as accurate as possible. As the Census Bureau reinstates the Population Estimates Challenge Program this decade, the Census Bureau should consider more flexible methodologies and broader use of administrative data to ensure meaningful opportunities to improve the accuracy of the estimates, including appropriate improvements to the estimates base. Additionally, the Committee directs GAO to review the Census Bureau's efforts and brief the Committee within 180 days of the Census Bureau completing its related work on the Population Estimates Challenge Program."

Exhibit 1



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Phone 313-224-3400
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www.detroitmi.gov

March 30, 2022

Via Electronic Mail

United States Census Bureau
National Processing Center
ATTN: CQR Geography Bldg. 63E
1201 E 10th Street
Jeffersonville, IN 47132

**Re: City of Detroit 2020 Census Count Question Resolution Operation Submission –
Housing Count Case**

To the Census Count Question Resolution Office:

Pursuant to the 2020 Census Count Question Resolution Operation (“CQR”) Participant Guide, OMB Control No. 0679-0879, *see* 86 FR 59980, as the highest elected official for the City of Detroit (“Detroit” or the “City”), I submit this supporting documentation regarding the City’s Housing Count Case challenging the Bureau’s undercount of valid housing units and associated population in the City of Detroit.

The 2020 Census undercounted the number of occupied housing units in Detroit. It undercounted the total number of housing units in Detroit. It undercounted the population of Detroit. The evidence included in this submission proves this undercount beyond any reasonable doubt. That evidence includes a study conducted by the University of Michigan which found that *the 2020 Census undercounted the number of occupied residential units in a sample of ten Detroit census block groups by 8.1%.*

The Census Bureau now has an obligation to set the record straight. The materials included in this submission demonstrate that the 2020 Census undercounted the total number of housing units in Detroit by at least 18,549 across 4,350 census blocks. These materials demonstrate that the 2020 Census undercounted the number of occupied housing units by over 8% in a sample of ten Detroit neighborhoods. A simple extrapolation from those data show that tens of thousands of Detroit residents were missed in the 2020 Census. The materials included in this submission show why that happened. For all of these reasons, the Bureau should make appropriate upward adjustments to Detroit’s housing unit count along with the associated population correction to more accurately reflect the population of the City of Detroit on Census Day 2020.¹

¹ This CQR submission is presented in three sections. Section I provides detailed evidence about the inadequacies of the 2020 Census enumeration process in Detroit, which resulted in a massive undercount of the population of our City.

In Section II, the impact of the Bureau’s under-resourcing of Detroit in conducting the census count is addressed with an expert analysis conducted by subject matter experts at the University

I. Causes of the Undercount

The 2020 Census was conducted under unprecedented circumstances which called for appropriate accommodations to ensure an accurate enumeration of the nation's population. Unfortunately, throughout the 2020 Census, the Census Bureau made unreasonable decisions that caused an undercount of the City's population, particularly related to Non-Response Follow Up ("NRFU") operations.² Beginning with under-resourcing the Area Census Office ("ACO") in Detroit and continuing with the failure to properly manage field operations, the Bureau's leadership actively undermined the Census count in our city.³

This was no accident; we saw it coming and sounded the alarm long before the numbers were reported. Warnings to the Census Bureau about the insufficiency of resources devoted to the count in Detroit and about other actions that had a deleterious effect on the enumeration went unheeded. In October 2020, I immediately protested the early end to the Census, knowing that cutting short the NRFU process would contribute to an undercount in Detroit.⁴ That protest fell on deaf ears.

A. Timeline of the 2020 Census

To properly understand the impact of the lack of appropriate resources devoted to the enumeration of Detroit, it is important to begin with the truncated schedule under which 2020 Census operations were conducted.⁵ On March 12, 2020, households began receiving official Census Bureau mail inviting them to respond to the 2020 Census online—the first time the Bureau

of Michigan, working in conjunction with Wayne State University. The study's findings confirm our belief that tens of thousands of Detroiters were not counted.

Finally, in Section III, we provide granular detail showing that processing errors resulted in the exclusion of thousands of housing units from the 2020 Census. We explain how, by using United States Postal Service ("USPS") records, the City has confirmed, block by block, the 2020 Census's failure to identify and count those housing units. We supplement those data with 360-degree imaging collected for each affected census block as part of a project undertaken by the City's Department of Innovation and Technology.

² When a household fails to self-report, the Census Bureau tries to ascertain information about the household through the NRFU process. During NRFU operations, residential units are supposed to receive multiple visits from census enumerators, with the goal of making contact with a household member. The low rate of self-response in Detroit means that the Census Bureau had to enumerate a large share of Detroit's population through the NRFU process.

³ Indeed, data from the Bureau's 2020 Post-Enumeration Survey, released on March 10, 2022, along with additional results from the 2020 Demographic Analysis, showed a statistically significant net nationwide undercount of the Black population of 3.3%, up from a 2.06% net undercount in 2010. This undoubtedly made a significant impact in Detroit, a city whose Black residents make up 78.3% of the population.

⁴ See <https://www.detroitnews.com/story/news/local/detroit-city/2020/10/28/duggan-tlaib-say-theyll-challenge-detroit-census-count/6053740002/>

⁵ For additional detail, see the 2020 Census Timeline attached as Exhibit A.

used an internet self-response approach. It was clear that internet-based self-reporting would present a particularly large obstacle in Detroit, one of the “least-connected” big cities in the country.⁶ We recognized this issue ahead of time, yet the Bureau took no steps to allocate sufficient resources to Detroit to address this need.

Due to the pandemic, in April 2020, the Census Bureau implemented a COVID-19 plan that extended the timeline for completing its operations. Under this plan, the Census Bureau would extend the window for field data collection and self-response to October 31, 2020.

However, on August 3, Commerce Secretary Ross reversed course and announced that the Bureau would cut its counting operations short, ending field data collection by September 30. In response, four former Directors of the Census Bureau issued a joint statement expressing concern over this truncated plan and stating that the result would be the under-representation of certain populations.⁷ The Commerce Department Inspector General ultimately issued a report concluding that when census procedures were “accelerated in August 2020, the decision came from outside the Bureau and further increased the risks to the accuracy and completeness of the 2020 Census.”⁸

Prior to the pandemic, NRFU operations were scheduled to begin on May 13, 2020. NRFU operations did not actually begin for the Detroit ACO until August 11.

In litigation challenging the early census termination plan, a federal court issued a preliminary injunction preventing the Bureau from ending field operations early. The Administration appealed to the Ninth Circuit, which rejected its request for a stay. Under the Ninth Circuit’s order, the count had to continue until October 31, 2020. The government appealed again. On October 13, the Supreme Court stayed the preliminary injunction in its entirety, allowing the Bureau to cease its counting operations immediately. On October 15, the Bureau did just that—ending all field operations for the 2020 Census.

As of August 11, 2020, the actual start date of NRFU operations in the City, the self-response rate in Detroit was 48.8%, compared to 77.2% in Oakland County and 79.5% in Macomb County.⁹ Notwithstanding the fact that Detroit’s self-response rate was lowest among the 50 largest cities in the United States, NRFU field enumeration in Detroit began later than operations in Oakland County, where self-response was far better. Under the Bureau’s truncated plan, enumerators had *only 50 days* to count over half the homes in the City of Detroit.

Further compounding the problem, NRFU operations in Detroit lagged behind surrounding communities. As of September 1, there was a 42.4% NRFU completion rate in Detroit compared

⁶ See “Assessing Miscounts in the 2020 Census,” *Urban Institute*, June 4, 2019. Available at: https://www.urban.org/research/publication/assessing-miscounts-2020-census/view/full_report

⁷ Vincent Barabba, Kenneth Prewitt, Robert Groves, and John Thompson, August 4, 2020. *Statement by Former U.S. Census Bureau Directors, August 4, 2020, On the Importance of Extending the 2020 Census Statutory Deadlines to Achieve A Fair and Accurate Enumeration of the United States*. Available at <https://www.documentcloud.org/documents/7013550-Aug-4-2020-Statement-By-Former-U-S-Census-Bureau.html>

⁸ Sept. 18, 2020 Commerce Department Office of the Inspector General Report, “The Acceleration of the Census Schedule Increases the Risks to a Complete and Accurate 2020 Census.” OIG-20-050-M.

⁹ See <https://data.world/usensusbureau/2020-census-response-rate-data>

to 62.6% in Macomb County and 75.8% in Oakland.¹⁰ These data reflect NRFU completion rates for roughly three weeks of NRFU operations. By September 15, the NRFU completion rate in Detroit was still only 71%, compared to 87.9% in Macomb County and 90% in Oakland. In spite of the fact that NRFU operations were making slow progress in Detroit, the Bureau actually directed resources out of the City as the deadline to complete census operations drew nearer.

The 2020 Census count in Detroit was crippled by the Bureau's failure to hire enough enumerators to conduct an accurate count. While the COVID-19 pandemic made hiring more difficult, the real culprit was the Bureau's original plan to hire an insufficient number of enumerators, and the Bureau's refusal to hire available workers in Detroit where the need was so abundantly clear.

B. 2020 Census Operations in Detroit Were Under-Resourced

The Detroit ACO was tasked with serving Michigan's largest city and county, yet operations here consistently lagged behind the neighboring Oakland County ACO. A permanent director of the Detroit ACO was not appointed until the fall of 2019, well after a permanent director had been named to the Oakland County office. An open house to kick off operations at the Detroit office was held in late February of 2020, at least a month after the kickoff of the Oakland County ACO. And, most importantly, notwithstanding Detroit's extremely low self-response rate, the NRFU field enumeration in Detroit began later than operations in Oakland County, where self-response was far better. This last decision defied all logic.

In early July of 2020, Gerard Szydloski resigned as head of the Detroit ACO. Even though this was a critical period for the Detroit count—the start of NRFU field operations—a replacement was not named until August 30. Just when the Bureau should have been focusing on the poor response rate in Detroit, census leaders left the office serving our city without leadership for nearly two months.

In early August, as NRFU field operations were set to begin, Detroit's self-response rate was lowest among America's 50 largest cities. Common sense would have dictated that Census Bureau leadership prioritize NRFU operations in Detroit in order to achieve the most accurate count for both the City and the state. Instead, Census leadership ignored the relevant data, and their own declaration that the NRFU Operation's "primary focus" is about hard-to-count populations,¹¹ and devoted an extra week of NRFU field operations to Oakland County, to the detriment of the count in Detroit.

On August 1, days before NRFU field operations were set to begin, the Census Bureau's payroll included only 155,000 temporary workers, "about a third of the half-million strong workforce the bureau said it need[ed] to complete the count."¹² As the count progressed, the need for enumerators only increased. One Detroit enumerator who attended training in August was told

¹⁰ See data from City University of New York researchers at <https://www.censushardtcountmaps2020.us/>

¹¹ See "2020 Census: Counting Everyone Once, Only Once, and in the Right Place—A Design for Hard to Count Populations," United States Census Bureau, at 54.

¹² <https://www.npr.org/2020/08/11/901202892/not-enough-time-census-workers-fear-rushing-count-could-botch-results>

by a supervisor that there would be approximately 60 people in attendance. When she arrived, there were only two people there to be trained.¹³

The Bureau's failure to hire enough enumerators in Detroit was not due to a lack of willing workers. Detroit's Complete Count Committee spent months working with local civic groups to encourage Detroit's residents to apply for enumerator positions and other jobs with the Census Bureau, including paying for billboards and digital ads, and promoting census jobs on the City website. As NRFU field operations began, the Committee was inundated with calls and emails from individuals saying that they had applied for an enumerator position but never received a response. Other individuals went through enumerator training but were never assigned cases to work.¹⁴

Numerous individuals working in Oakland County offered to work in Detroit once the count in their designated area had slowed down, but they were never assigned any cases to work despite making multiple requests.¹⁵ One Oakland County enumerator stated that she asked to be assigned to Detroit on three separate occasions, but, instead, was assigned to visit homes in Oakland County that had already been visited five or six times.¹⁶

Perhaps most egregiously, as NRFU field operations drew to a close in late September and early October, Census supervisors attempted to divert enumerators away from the City. Enumerators in Detroit were offered the chance to leave the City to work in other areas of the state.¹⁷ Some were even offered the opportunity to go out of state to work, and were told that the Bureau would pay their housing expenses.¹⁸ And as the NRFU process drew to its premature close, some enumerators who remained in Detroit were not assigned any additional work.¹⁹ Of course, there was still a significant amount of work to be done to achieve an accurate count in Detroit.

The lack of enumerators was not the only problem with the NRFU process. A significant number of enumerators reported being improperly trained and experiencing frequent difficulties with the Bureau's technology.²⁰ At least ten different enumerators identified repeat visits to homes as a significant issue.²¹ According to one enumerator, "I personally had dozens (if not more) of apartments or homes where I personally completed the census with someone and then found myself going there again a week later with absolutely no history of attempts in the system." Another enumerator reported that as she was leaving an address, she encountered two other enumerators who had arrived to enumerate the same address. When the three of them compared their lists, they discovered that they had been assigned the same list of addresses to visit *on the*

¹³ See Ex. B, Statement of LaTondra Webb.

¹⁴ *Id.*

¹⁵ *Id.*; see also Ex. C, Statement of Mary Kovari.

¹⁶ *Id.*

¹⁷ See Ex. D, Statement of Josh Samson.

¹⁸ *Id.*; see also Ex. E, Statement of Brenda Jett; Ex. F, Statement of Alma Anderson; Ex. G, Statement of Clois Foster.

¹⁹ See Ex. H, Statement of Rochelle Taylor; see also Ex. B, Statement of LaTondra Webb.

²⁰ See Ex. E, Statement of Brenda Jett.

²¹ See, e.g., Ex. I, Statement of Anna Geck.

same day.²² Technological and communications challenges were rampant for enumerators in Detroit. Dozens of enumerators reported being unable to get in touch with their supervisors and, in the rare instances that they were able to reach them, finding that the supervisors offered no assistance or guidance to resolve problems.²³

Further exacerbating problems with the count in Detroit, as a direct result of the decision to limit the time for NRFU field operations, supervisors encouraged enumerators in the City to cut corners in the NRFU process. Under the Census Bureau's final operational plan, a residence was not eligible to be evaluated using proxy information until *at least* the third visit by an enumerator.²⁴ But, proxy information was used to enumerate homes in Detroit that had been visited fewer than three times by enumerators. One enumerator assigned to work in Detroit stated that she was instructed by a supervisor to use proxy information after a single visit to residences.²⁵ Another enumerator was instructed to use himself as a proxy in order to complete a case.²⁶ Of course, that corruption of the proxy process was certain to reduce the number of residents counted in Detroit.

Data collected through NRFU operations, proxy interviews, administrative records, and by count imputation likely undercounted people within households and housing units in Detroit. Census Bureau data show that for self-responding households, the average household size was 2.6.²⁷ But for NRFU, it was only 2.3. For household in-person interviews, that average was 2.5, but where information was reported by proxy, the average household size was only 2.2. Where administrative records were used, it was 1.9. Further, the average household size for count imputation (the statistical estimate for households which have no data) was only 1.9. This is especially relevant for Detroit, where evidence from enumerators shows that the count skipped straight to proxy or administrative records far too quickly. Notably, looking at data for "Percent Single-Person Occupied Housing Units," one sees that 28% of Michigan households that self-responded were occupied by a single person. But when data were collected by proxy, that number is 46%; for administrative records, it is 46%; and for count imputation, it is 49%.

Similarly, with respect to data for "Housing Units by Status," in Michigan, 15% of vacant units were identified not by a follow-up, but by administrative records. An additional 2% of vacant units were determined by count imputation. This shows that approximately 17% of vacancies in Michigan were identified as vacant without contact at the door. Again, evidence from enumerators demonstrates that this problem was particularly prevalent in Detroit.

In 2020, the Census Bureau also grossly understaffed partnership specialists at the Detroit ACO. In 2010, the Census Bureau assigned 15 partnership specialists to work in Detroit, and each

²² See Ex. F, Statement of Alma Anderson.

²³ *Id.*; see also, e.g., Ex. D, Statement of Josh Samson.

²⁴ "The default number of contact attempt-days for a NRFU case is six. At the conclusion of the third contact attempt, a NRFU case becomes proxy-eligible. Enumerators will attempt to contact at least three respondents that do not live in the household but may be knowledgeable about the household." U.S. Census Bureau NRFU Detailed Operational Plan v2.0 at 20.

²⁵ See Ex. G, Statement of Clois Foster.

²⁶ See Ex. J, Statement of Jeff Breza.

²⁷ <https://public.tableau.com/app/profile/us.census.bureau/viz/2020CensusOperationalQualityMetricsRelease2/Size>

specialist had 20 assistants.²⁸ For the 2020 Census, there were only two partnership specialists assigned to Detroit, with no assistants.²⁹ No amount of technological advancement can explain such an extreme reduction in staffing. Census media specialist Char Yates summarized her experience in clear terms: “The leadership . . . did not know or care what was going on with the census in Detroit.”³⁰

C. The City’s Own Efforts to Ensure an Accurate Count Were Unsupported

The City went to great lengths to ensure an accurate count of its residents. The City created a Complete Count Committee in January 2019 dedicated exclusively to the 2020 Census. The Committee partnered with more than 120 local organizations over two years to perform canvassing and outreach, including knocking on over 400,000 doors and organizing over 200 presentations and events, in an effort to increase awareness and encourage residents to respond to the 2020 Census. Those efforts were not matched—indeed, they were undermined—by the Bureau. Census leadership refused to assign experienced census workers to Detroit. For example, Detroit’s Complete Count Committee asked that Linda Clark, a partnership specialist supervisor, be assigned to work with Detroit, a request that Ms. Clark supported. That request was denied, and Bureau leaders assigned Ms. Clark elsewhere, where her relationships and connections to the City were wasted. On August 1, 2020, even though the Detroit count was far from complete, Coire Houston was discharged from her position as a partnership specialist. Incredibly, Bureau leadership cited a lack of work as the basis for letting her go.³¹

This is just a small sample of the obstacles the Bureau created to conducting an accurate enumeration in Detroit. It is undeniable that these decisions had a negative impact on the City’s final count.

D. The City Has Been Significantly Harmed

As Mayor of Detroit during the 2020 Census, the attached statements barely scratch the surface of the complaints and comments I received regarding how poorly the census was conducted. The real measure of the damage caused by the Census Bureau’s egregious conduct is the undercount of the City’s housing units and population demonstrated in the University of Michigan study and confirmed with USPS data as described below. From what we personally observed, it is no surprise that the Commerce Department’s own Inspector General found that the Bureau “cut corners with a quality control process” which will “call into question the results for more than 500,000 households.”³² This is almost certainly a gross understatement of the number

²⁸ See Ex. K, Statement of Coire Nichols Houston.

²⁹ *Id.*

³⁰ See Ex. L, Statement of Char Yates.

³¹ See Ex. K, Statement of Coire Nichols Houston.

³² https://lite.cnn.com/en/article/h_619864c9f1f90d7f23db0fc9a87a8c07; see also Dec. 28, 2020 Commerce Department Office of the Inspector General report, “Inability to Finish Nonresponse Followup RIs [re-interviews] Raises Concerns Over the Quality of More Than 500,000 Cases.” OIG-21-015-M.

of households that were affected by the Bureau's unreasonable decisions, and we are not aware of anywhere in the country where the census was conducted as poorly as it was conducted in Detroit.

The impact of the resulting undercount is devastating. Aside from the dilution of the City's representation in Washington and in Lansing, the financial impact is massive. Since 2010, the City of Detroit has received more than \$3.5 billion annually in federal funding tied directly to the Census count. Each year, the City has received more than:

- \$2 billion for Medicaid
- \$69 million for special education grants
- \$54 million for head start programming
- \$51 million for school lunch programs
- \$21 million in unemployment assistance
- \$13 million in community facilities grants

The City's federal funding tied to the 2010 Census exceeded \$37 billion. This funding has been an integral part of the City's revitalization and redevelopment over the past decade.

A roughly 8% undercount of Detroit's population in the 2020 census creates disastrous financial consequences for the City. Had our reported population been 50,000 residents lower in the 2010 Census, the City would have lost more than \$2.75 billion in federal funding over a ten-year period. A loss of that magnitude from the 2020 census dramatically reduces our ability to provide essential programs and services to our citizens.

II. University of Michigan Study

To better understand the extent to which the 2020 Census undercounted the population of Detroit, the City asked subject matter experts at the University of Michigan to analyze a sample of ten residential block groups in the City. The findings of the University of Michigan study confirmed our belief that tens of thousands of Detroiters were not counted.

In 2019, the Census Bureau estimated that Detroit had a population of roughly 670,000 people. However, just one year later, the 2020 Census counted only 639,000 residents living in the city, a decline of roughly 31,000 residents from its 2019 estimate. The University of Michigan researchers observed that in the context of the Census Bureau's previous enumerations and estimates of Detroit's population, a difference of 31,000 residents was anomalous and implausible. In its report entitled "Analysis of the Census 2020 Count in Detroit," the University of Michigan team laid out evidence demonstrating that the Census Bureau undercounted Detroit's population in 2020.³³ Key findings of the University of Michigan study include:

- The 2020 Census undercounted the number of occupied residential units in ten Detroit Census block groups the University of Michigan team analyzed by 8.1%.
- Detroit is an outlier compared to other U.S. cities in the extent to which its 2020 Census population and housing counts deviate from the Census Bureau's 2019 population and housing estimates.

³³ The University of Michigan report is attached as Exhibit M.

- Data from the University of Michigan analysis of Census block groups and peer cities offer compelling evidence of a likely undercount of Detroit in the 2020 Census.

The University of Michigan report presents the results of an analysis of ten block groups in Detroit, comparing the Census Bureau's count of occupied housing units in those block groups with counts from United States Postal Service data from June 2020, when the Census was taking place. For five of these block groups, the University of Michigan team also presented data from a canvass conducted by researchers from Wayne State University ("WSU") in September and October 2021 that provides data on the number of housing units and the number of occupied housing units in those block groups.

The University of Michigan analysis showed that the 2020 Census produced an undercount of occupied housing units in the ten sampled block groups, including one set of five block groups with relatively high rates of residential stability and another set of five block groups with higher vacancy rates and lower rates of self-response in the 2020 Census. In the set of more residentially-stable block groups sampled, the 2020 Census produced an undercount of between 223 and 277 occupied units, counting between 7.6% and 9.2% fewer occupied units. In the five less residentially stable block groups analyzed, the 2020 Census produced an undercount of 161 units, or roughly 9% fewer units.

In sum, after conducting an audit of the Census counts of residential units and occupied units in a selection of both more stable and less stable Detroit block groups, the University of Michigan study found that the 2020 Census undercounted the number of occupied residential units across these ten block groups by 8.1%, missing an estimated 964 Detroit residents.³⁴ If undercounts of a similar magnitude occurred in a majority of the city's more than 600 block groups, the total undercount would be in the tens of thousands.

In addition to this block group level analysis, the University of Michigan team also analyzed other data produced by the Census Bureau, which show Detroit as an outlier compared to other U.S. cities in the size of the discrepancy between the Census Bureau's 2019 population estimate and its 2020 population count. Given the circumstances of the 2020 Census count in Detroit (e.g., high reliance on internet self-response and abbreviated NRFU period, combined with the City's hard-to-count characteristics) these data offer compelling evidence of an undercount of Detroit's population in the 2020 Census.

A. Analysis of More Residentially Stable Neighborhoods

To assist with the University of Michigan study, the City commissioned WSU to conduct a canvass of five Census block groups in which the vacancy rate reported in the 2020 Census was far higher than one would expect based on vacancy estimates from the 2015-2019 American

³⁴ As described in the appendix to the University of Michigan report, the researchers considered any potential impact of the Bureau's use of "differential privacy" methodology, which intentionally adds statistical noise to block-group level counts and therefore may have impacted the analysis. The report's authors wrote: "[t]o understand the impact the differential privacy procedure might have on vacancy rates at small geographies, we applied the differential privacy procedure to Detroit's 2010 Census counts at the Census tract and block group levels and found it had very little impact on this measure at these geographies, giving us more confidence in the block group audits." Ex. M, n. 6.

Community Survey (“ACS”). Researchers from the University of Michigan, in collaboration with City staff, selected a set of five block groups where the counts of occupied housing in the 2020 Census were substantially lower than (a) counts of housing units with active DTE Energy (a Detroit utility provider) accounts and (b) estimated counts of occupied housing units from the 2015-2019 ACS. These five block groups also had relatively high rates of residential stability and homeownership based on the 2015-2019 ACS.

In short, this set of five block groups was selected to represent areas of the City where it should have been relatively easy to produce accurate population counts—because they have high rates of residential stability and a preponderance of single-family, owner-occupied homes—and yet the 2020 Census produced anomalously low rates of occupied housing. The 2020 Census inaccurately classified a substantial number of occupied housing units in these areas as vacant, which translated into a substantial undercount of the population.

The WSU team canvassed these five block groups to count the total number of housing units and determine the occupancy/vacancy status of each housing unit. Canvassers were trained to determine the occupancy status of a housing unit based on physical characteristics of the structure (e.g., a car in the driveway, lights on in the home), and, when occupancy status was ambiguous, to talk to possible occupants of the housing units and/or neighbors.³⁵

The University of Michigan team found that across all five block groups, occupancy rates as measured by the WSU canvass and the USPS data were between 6.2% and 15% higher than occupancy rates measured by the Census, with a high degree of similarity in the rates derived from the two non-Census sources. In each block group, the USPS and WSU data show an apparent Census undercount of between 16 and 85 occupied units. In total, the WSU data suggest a Census undercount of 277 occupied units across these five block groups (9.2% fewer occupied units), and the USPS data suggest an undercount of 223 occupied units (7.6% fewer occupied units).

B. Analysis of Less Residentially Stable Neighborhoods

In addition to analyzing the count of residential units and *occupied* residential units in residentially stable block groups, the University of Michigan team also conducted an analysis of occupied residential units in five block groups with high vacancy rates and low rates of self-response in the 2020 Census. If the first set of block groups should have been easy to count, this second set of block groups was chosen to evaluate the potential for an undercount in block groups where it may have been harder to achieve an accurate count.

The University of Michigan team’s initial hypothesis was that if there was a potential census undercount, it would be greater in these less residentially stable block groups than in the more stable block groups discussed above. This hypothesis was borne out by the data, which show that the Census counted 9.1% fewer occupied units than the USPS in these block groups, a slightly greater undercount than was found among the more residentially stable block groups where USPS data suggested that 7.6% of occupied units in those areas were not counted by the 2020 Census.

³⁵ To address any concern that occupancy conditions may have changed between the time of the 2020 Census and the WSU canvass, the University of Michigan team drew upon a third data source—the USPS Delivery Sequence File from June 2020—which also provides counts of occupied housing in the sampled block groups from a time period that is contemporaneous with the 2020 Census.

A potential undercount of this magnitude is extremely significant. The University of Michigan team used the results from the audit study to project how many people may have been undercounted in the sampled block groups based on the discrepancy between the USPS data and 2020 Census in their counts of occupied housing units. Aggregating across all 10 sampled block groups, the University of Michigan study projected that the Census undercounted these areas by 964 people, equivalent to 8.14% of the estimated population of these areas. If undercounts of a similar magnitude occurred in a majority of the city's more than 600 block groups, the ultimate size of a potential undercount would be in the tens of thousands.

C. Divergence From Prior Population and Housing Unit Estimates

One would expect the trend line in annual population estimates to align fairly well with the decennial census count. However, as noted above, Detroit's 2020 count diverges significantly from prior estimates. For Detroit, the Census Bureau estimated an average annual population decline of 0.9% between 2011 and 2016, and just 0.4% between 2016 and 2019. The decline from 2019 to 2020 suggested by the 2020 Census—a nearly 5% drop in the City's population—is out of line with recent trends, as well as with the discrepancies the University of Michigan team observed in 2019 estimates and 2020 counts in other U.S. cities.

The University of Michigan team also observed a large discrepancy between the Census Bureau's 2019 estimate and 2020 count of housing units in Detroit. In 2010, the Census counted 349,000 housing units in Detroit. Throughout the decade, the Census Bureau updates its Master Address File ("MAF"), using twice-yearly updates from the USPS. Roughly three years before the enumeration, the Census Bureau shared this information with local governments in its Local Update of Census Addresses ("LUCA") program. After signing an agreement to maintain the confidentiality of the list, local governments were able to add, delete or correct addresses that would be used in the 2020 Census. In 2018, officials from the Detroit Planning Department provided the Census Bureau with an address file showing roughly 368,000 residential units—occupied or vacant—in the city.

The City of Detroit's estimate of 368,000 residential units is very close to the Census Bureau's own estimate of 364,000 residential units from the 2017 ACS. By 2019, the Bureau's estimate had fallen slightly, to 359,000 units. But the 2020 Census enumerated only 310,000 residential units, implausibly suggesting a single year decline of nearly 50,000 housing units.

D. Detroit 2020 Census Count Compared to Other Cities

In addition to comparing Detroit to other large cities, the University of Michigan team also compared the discrepancy between Detroit's 2019 estimates and 2020 counts with other industrial cities in the Midwest and Northeast, some of which, like Detroit, have also experienced population decline over the past 50 years.

The University of Michigan report found Detroit to be an outlier. The University of Michigan researchers compared the 2020 Census population and housing counts and the 2019 estimates in Detroit and other peer cities, including high poverty cities with large shares of Black residents, such as Cleveland and St. Louis. The difference between Detroit's 2020 census count and 2019 estimate, at 4.6%, is more than twice the gap of the next closest city, Cleveland (2.2%). The housing discrepancy is even greater, with Detroit's nearly 14% gap more than three times

Cleveland’s gap of 4.3%. A full comparison is included in the University of Michigan report, Ex. C, at 6.

In any given census, certain populations—including people of color, immigrants, children, and low-income households—are harder to count, for a variety of reasons. However, other cities that share certain hard-to-count characteristics with Detroit—such as high rates of poverty or large shares of residents of color—did not experience the same discrepancy between 2019 estimates and the 2020 count seen in Detroit.

III. USPS Records Show the 2020 Census Undercounted Housing Units in Detroit

The City has analyzed 2020 Census enumeration data and has identified “census processing errors that excluded valid housing.”³⁶ These census processing errors affected at least 4,350 census blocks in Detroit, resulting in an undercount of at least 18,549 housing units in those blocks.

The City compared 2020 Census block-level counts against USPS records for all residential census blocks in Detroit. As the basis for this comparison, the City used records from the USPS database for deliverable addresses from May 2020 to coincide with the timing of the 2020 Census enumeration. The details of that analysis are described more fully below. The results are striking: the 2020 Census appears to have missed at least 18,549 housing units across 4,350 census blocks in the City. The processing error that resulted in this massive undercount requires immediate rectification.

Pursuant to Bureau guidelines, the City herein submits a list of all contested 2020 tabulation blocks in Detroit. That list is on the enclosed spreadsheet:

cqr20_DetroitCity_PL2622000_UpdatedBCL_20220216.xlsx

Columns D and E of the spreadsheet identify the specific census tracts and census blocks where an undercount occurred. Column F identifies the 2020 Census housing unit count for each block. Column H identifies the actual housing unit count for each block according to USPS records. As reflected on the spreadsheet, there are 4,350 census blocks in the City for which contemporaneous USPS records show a greater number of housing units than the 2020 Census enumeration. While the 2020 Census enumerated 95,696 housing units across these 4,350 blocks, USPS records show there were, in fact, 114,245 units—an undercount of 18,549 housing units.

As further supporting documentation of this housing unit undercount, the City encloses the spreadsheet:

cqr20_DetroitCity_PL2622000_DetroitStreetView_20220216.xlsx

This spreadsheet contains two columns. Column A lists the GEOIDs of census blocks included in the City’s CQR challenge list. Column B provides a link to the “Census Block Viewer” imagery for each location.

Detroit Street View is a project run by the City’s Department of Innovation and Technology (“DOIT”). DOIT collects 360-degree imagery data of the City of Detroit for use by city departments and the general public. The data are owned by the City of Detroit and provided to residents and other interested parties free of charge. The City has built a custom “Census Block

³⁶ See CQR Participant Guide at x.

Viewer” for this imagery that can be used to review the housing units along these blocks. The viewer defaults to images captured during the enumeration period of April 2020 to November 2020, and that imagery is presented via the links in Column B of the spreadsheet.

The imagery captured in the Census Block Viewer provides further substantiation (in addition to the contemporaneous USPS records) of the Bureau’s undercount of residential housing units in these 4,350 census blocks.

A. Housing Count Discrepancy Analysis Details

Pursuant to Section 3.2 of the CQR Participant Guide, the enclosed spreadsheet `cqr20_DetroitCity_PL2622000_UpdatedBCL.xlsx` includes the contested 2020 tabulation blocks in the City of Detroit, census housing counts, and actual (corrected) housing counts as of the time of the 2020 Census.

In order to “provide as much detail as possible about the housing count discrepancy to assist the Census Bureau with its research,”³⁷ the City supplies the following information:

- On June 16, 2020, the City of Detroit ran a table of all Detroit addresses through a tool called Mailing List Cleaner, a product of TEC Mailing Solutions. This tool added data from the May 2020 USPS ZIP4 Database, which includes Delivery Point Validation information.³⁸
- The location of each address is the center point of the building footprint to which the address is linked in the database. The City used that location to spatially intersect the 2020 census blocks with all of the addresses in ArcGIS.
- The City removed 139 addresses that were determined to be duplicates. These duplicate addresses were either the “building-level address” of a multi-unit building (e.g. 123 Main Street, where the building is actually composed of 123 Main Street, Apt. 1 and 123 Main Street, Apt. 2) or instances in which the addresses referred to the same housing unit but had been written in a different manner (e.g. 123 Main Street, Apt. 2 vs. 123 Main Street, Upper).
- The City filtered the dataset to include only residential addresses that were linked to a building footprint and for which the May 2020 USPS Delivery Point Validation ‘DPV_VACANT’ data for that address was ‘Y’ or ‘N’ and was not blank (which would indicate a ‘No Stat’ address).
- The City then cross-referenced its Completed Residential Demolitions dataset (available on the City’s Open Data Portal) to the filtered dataset. The City removed 12,411 addresses of buildings that were demolished before April 1, 2020 that had a ‘DPV_VACANT’ value of ‘Y’ or ‘N’ in the May 2020 Postal Service data.

³⁷ See CQR Participant Guide at *xii*.

³⁸ The CASS (Coding Accuracy Support System) report for the May 2020 USPS data the City accessed using Mail List Cleaner is attached as Exhibit N.

- After applying these filters, the City tabulated the number of addresses within each 2020 census block and compared that number to the total housing unit count published by the Census Bureau. There were 4,350 blocks where the USPS housing unit count was higher than the 2020 Census housing unit count. Those are the blocks listed in the 'cqr20_DetroitCity_PL2622000_UpdatedBCL_20220216' file. For those blocks, the total count of residential USPS Delivery Point Validated addresses is 114,245, and the total count of housing units in the census data is 95,696. This is a difference of 18,549 housing units.

Census Bureau guidelines provide that housing count cases “may result in the addition of specific housing identified during the census process, but erroneously excluded from enumeration.”³⁹ The City’s comparison of the 2020 Census count against high quality administrative records from the USPS provides ample evidence that the Bureau severely undercounted the number of residential housing units in the City, thus erroneously excluding that housing from enumeration. The University of Michigan study shows that the 2020 Census undercounted the number of *occupied* residential units in Detroit as well. While Bureau guidelines dictate that governmental units “can only request a review of housing counts during 2020 Census CQR . . . [t]hey cannot request a review of population counts,”⁴⁰ having missed both *occupied* housing units and *total* housing units, it is abundantly clear that the 2020 Census undercounted the total population of the City of Detroit, failing to count tens of thousands of Detroit residents.

For the reasons stated herein, the Bureau should make appropriate upward adjustments to Detroit’s housing unit count and to the associated population within the City.

Respectfully submitted,



Michael E. Duggan
Mayor

³⁹ CQR Participant Guide at xi.

⁴⁰ *Id.*

Exhibit A

2020 CENSUS TIMELINE

Date	Event
3/12/2020	Households began receiving official Census Bureau mail inviting them to respond to the 2020 Census online—the first time the Bureau used an internet self-response approach.
4/1/2020	Census Day: the 2020 Census counted where people lived as of this day.
4/13/2020	Census Bureau implemented a Covid-19 plan that extended the timeline for completing its operations. Under this plan, the Bureau would extend the window for field data collection and self-response to October 31, 2020.
5/13/2020	Planned (pre-pandemic) start date for Non-Response Follow Up (“NRFU”) operation. ¹
7/1/2020	Resignation (approximate) of Detroit Area Census Office (“ACO”) director.
8/3/2020	Commerce Secretary Ross announced that the Bureau would cut its counting operations short, ending field data collection by September 30.
8/6/2020	Start date (approximate) for NRFU operations for the Oakland County ACO.
8/11/2020	Start date for NRFU operations for the Detroit ACO. As of August 11, the self-response rate in Detroit was 48.8% , compared to 77.2% in Oakland County and 79.5% in Macomb County. Under the Bureau’s truncated plan, enumerators had <i>only 50 days</i> to count over half the homes in Detroit.
8/30/2020	Replacement director for Detroit ACO hired. During the critical phase of NRFU field operations, the Detroit ACO was without a leader for nearly two months.
9/18/2020	Commerce Department Inspector General report concludes that when census procedures were “accelerated in August 2020, the decision came from outside the Bureau and further increased the risks to the accuracy and completeness of the 2020 Census.”
9/24/2020	Federal court issued preliminary injunction preventing the Census Bureau from operating on the timeline in its rush plan, and from ending NRFU on September 30.
9/30/2020	End date of NRFU operations under Commerce Department truncated schedule.
10/15/2020	Census Bureau ceased counting operations following Supreme Court’s stay of the preliminary injunction. As of October 15, the self-response rate in Detroit was 50.9% , compared to 79.6% and 81.8% in Oakland and Macomb Counties.
10/31/2020	End date of NRFU operations under original Covid-19 plan and appeals court order. Per the Supreme Court order, NRFU operations ended on October 15.
4/26/2021	Bureau released apportionment data, the first results for the 2020 Census.
8/12/2021	States received 2020 Census redistricting data.
12/16/2021	University of Michigan report details 2020 Census undercount of occupied housing units in ten Detroit census block groups by 8.1%.
3/10/2022	Census Bureau released the first set of results from the 2020 Post-Enumeration Survey along with additional results from the 2020 Demographic Analysis. Among other things, these data showed a statistically significant undercount of the Black population of 3.3%, up from a 2.06% undercount in 2010. The undercount of all racial minorities except Asians increased from Census 2010 to Census 2020.

¹ When a household fails to self-report, the Census tries to ascertain information about the household through the NRFU process. During NRFU operations, residential units are supposed to receive multiple visits from census enumerators, with the goal of making contact with a household member. The low rate of self-response in Detroit means that the Census Bureau had to enumerate a large share of Detroit’s population through the NRFU process.

Exhibit B

STATEMENT OF LATONDRA WEBB

1. My name is LaTondra Webb. I live in the City of Detroit. I have worked for the State of Michigan doing business and administrative work.
2. I was hired to work as an enumerator in Detroit for the 2020 Census. It was the worst job I've ever had.
3. I was hired on August 24 and went through orientation that same day. The orientation was supposed to last for 2 hours but I had to stay for 4 hours because none of the equipment was ready for enumerators to pick up.
4. When I went for training, I was told by a supervisor named Tyrone that there would be about 60 enumerators at the session, but only 2 people showed up. I do not feel that I was properly trained to work as an enumerator.
5. I know a lot of people who applied to work as an enumerator but never received a phone call.
6. After I completed the in-person training, my supervisor never called me.
7. I was given an 800 number to call with questions. I called the number multiple times but it just rerouted to a call center where the people were not helpful. On one occasion when I called, I was told that the supervisor would call me later that day to let me know when and where I would be working and to provide the links for the online training. That never happened.
8. I did not find out what area I was supposed to be working until the first or second week in September, but I was still not given any information to complete the online training.
9. A supervisor finally contacted me on September 24. During that call I was told that I would be sent a link to complete the online training within 48 hours, but I never received the link. I kept calling to find answers but everyone seemed to just pass the buck.
10. Eventually, I was able to complete 3 hours of training on the computer, but I was never actually sent into the field to work as an enumerator.
11. While I had my census issued phone, I received mass text messages from supervisors asking if enumerators wanted to go to other states to work, including Texas or Alabama. The messages offered to pay for lodging for enumerators who were willing to travel.
12. To date, I still have not been paid for the time that I spent completing the orientation and training.

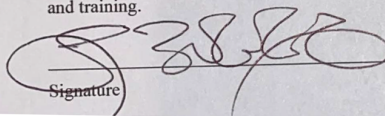

Signature1/20/2021
Date

Exhibit C

STATEMENT OF MARY KOVARI

1. My name is Mary Kovari. I live in Oakland County in Michigan and work as an educator.
2. I worked in Oakland County, Michigan as an enumerator for the 2020 Census.
3. I began working as an enumerator in early August. By late August, the work in Oakland County began to slow down.
4. Around this time, supervisors began offering opportunities for enumerators to travel to other locations to work, including Detroit, Grand Rapids and several locations in other states.
5. The opportunity to work in Detroit was mentioned once in an email and twice on group Zoom meetings.
6. On three separate occasions I volunteered to work in Detroit, but I was never assigned any cases to work.
7. During group meetings, when my supervisor mentioned the opportunities for enumerators to work in other locations, I would remind him that I wanted to work in Detroit.
8. Instead of being sent to work in Detroit, I continued receiving cases to work in Oakland County, including addresses that had already been visited 5 or 6 times.
9. There seemed to be more of a commitment to having enumerators travel to Grand Rapids or out of state, than to Detroit.
10. I had to stop working in mid-to-late September to return to my primary occupation as an educator.

Mary Kovari
Signature

1/22/2021
Date

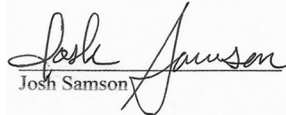
Exhibit D

STATEMENT OF JOSH SAMSON

1. My name is Josh Samson.
2. I worked as an enumerator for the 2020 Census.
3. I applied to be an enumerator in January of 2020. I did not get a response until the end of June when I received a call informing me that training seminars were going to be held. I called back in July and was assigned an August 3 training date.
4. I do not feel like I received proper training. The training session was just a series of Power Point slides.
5. I received text messages on my census issued phone stating that "Detroit area is lacking talk to supervisor." Twice I requested to go to Detroit to work, but I was never sent there. My supervisor said that he would contact the area supervisor to have me sent to work but he never did.
6. Instead of being sent to Detroit, I was assigned to areas all over the state. I was sent on a 3-hour drive to Caseville (in the Thumb area) to enumerate four cases. I was also sent to enumerate cases in Battle Creek and St. Clair County.
7. Supervisors seemed enthusiastic about sending me to other areas of the state instead of to Detroit. I was offered a \$500 bonus to travel to another state to work, but I never got a call back about working in Detroit.
8. There were a lot of communication issues. I tried contacting my supervisor with complaints and concerns. But, we were told that we were no longer allowed to text our supervisors, and that we could only call them. This was strange because previously we had always communicated with them via text message.

9. I found it odd that I had the power to delete an address on my census-issued phone, which would completely remove potential follow up cases from the list. Because bonuses were paid to close cases, this might incentivize some enumerations to improperly delete addresses and close cases. A text message was sent to the supervisor when an address is deleted, but, supervisors likely did not scrutinize the text messages that they received.

10. I took my job seriously and did not want the citizens of Michigan to be undercounted. The entire process was a mess.


Josh Samson

1-19-2021
Date

Exhibit E

STATEMENT OF BRENDA JETT

1. My name is Brenda Jett. I am a retired teacher in the Detroit Public Schools.
2. I worked as an enumerator in Detroit for the 2020 Census.
3. When I attended orientation we were told that we would be working within 3 days.

However, we did not get to start working until 5 or 6 days had passed.

4. After I was assigned cases to work for the first time, I had to wait 2 or 3 days to begin because I had not been given a badge.

5. While I worked as an enumerator, I spoke with individuals who had been hired to work as enumerators but who were never assigned cases to work. I do not recall their names.

6. There were a lot of issues with the case assignment lists. At one point during August, I was not receiving cases. I was told by a supervisor that the database was stuck. Near the end of the count, the case assignment list was not being updated daily. At one point, I had the same list of assignments for three days.

7. I did not receive any new case assignments for the last 5 days before the count ended.

8. A lot of the information that was included in the case assignments was outdated. Many of the phone numbers did not work. There were also a lot of vacant lots and abandoned buildings for the addresses that I was assigned.

9. After I visited an address, supervisors would tell me to find a proxy rather than to make another attempt to visit the building, unless I observed a person entering the dwelling.

10. I received texts and emails in late September offering enumerators the opportunity to go out of state to work.

Brenda C Jett
Brenda Jett

1-20-21
Date

Exhibit F

STATEMENT OF ALMA ANDERSON

1. My name is Alma Anderson. I am employed by the Southeast Michigan Health Association, working with the City of Detroit Health Department.

2. I worked as an enumerator in Detroit for the 2020 Census. I worked from mid-August through late September.

3. I previously worked as an enumerator for the 2000 and 2010 censuses.

4. My husband originally signed up to work as an enumerator. However, he changed his mind before attending the training. He continued to receive phone calls asking if he wanted to work, which led me to believe that there was a shortage of workers.

5. My experience working as an enumerator in 2020 was difficult.

6. We were given a hotline number to call with questions or complaints.

7. When I reached out to my supervisor with questions, he would tell me to call the hotline. However, when I called the census office or hotline number with questions about the case list or other issues, no one ever answered the phone.

8. In my previous experiences working as an enumerator, there was always someone available to answer your questions or to document complaints.

9. In 2000 and 2010, I was assigned to enumerate cases all over the City. For 2020, I was only assigned cases within a 2 or 3 mile radius of my home in Detroit.

10. When a property that I was assigned to enumerate was vacant, I would list it as vacant in my census issued iPhone. However, even after entering properties as vacant, I was still sent back to visit the same properties.

11. Some of the addresses on the cases that I was assigned were mixed up. As a result, I would have to waste time going back and forth on a single street because the list was either inaccurate or out of order.

12. On one occasion, I was working the same street as another enumerator. When we compared our lists we realized that we were assigned to do the same houses, on the same block, on the same day.

13. On another occasion, I went to an apartment building to enumerate. When I arrived, there was another enumerator at the building working the cases that I had been assigned.

14. Many of the residents that I spoke with told me that they had already filled out the census.

15. I was asked if I wanted to go to Chicago to work as an enumerator.

16. Based on my experience, more time was needed to complete the count in Detroit.

Alma Anderson
Alma Anderson

01/21/2021
Date

Exhibit G

STATEMENT OF CLOIS FOSTER

1. My name is Clois Foster. I am a retired US Postal Service employee.
2. I worked as an enumerator in Detroit for the 2020 Census.
3. I applied to work for the US Census in October of 2019 and was ultimately trained in August 2020.
4. I completed the training in August of 2020 but found the training very disorganized and confusing. The people that handled the training seemed very hurried and unprepared. They initially gave me a Census phone with someone else's ID and it took time to fix this.
5. I started working as an enumerator on August 20, 2020. Initially I was getting nearly 100 cases a day to work on.
6. By the end of September I started receiving, at most, 15 cases a day. I was told at that time that we were on standby to help other people because my area was done.
7. In this last period I received cases in Westland, Wayne and Inkster but not Detroit.
8. I received text messages from the Census Bureau at the beginning of October offering me opportunities to go out of state
9. While I worked as an enumerator, it seemed like all we were doing was getting proxies.
10. We were initially instructed to get proxies after at least 3 or 4 attempts. Shortly thereafter we were told to get proxies after only 1 or 2 attempts.
11. It was difficult and not possible in many of the cases to get proxies in that people did not want to talk about their neighbors.
12. We were not sent out in teams and did not have enough enumerators to go out safely in groups. I feel this affected our ability to count Detroit properly.

Clois Foster
CLOIS FOSTER

01 - 21 - 2021
Date

Exhibit H

STATEMENT OF ROCHELLE TAYLOR

1. My name is Rochelle Taylor.
2. I worked in Detroit as an enumerator for the 2020 Census.
3. I applied for the enumerator position early in 2020, but I did not receive a call letting me know that I had been hired until near the end of August.
4. I completed the enumerator training and began working at the end of August.
5. I informed my supervisors that I could work 25-28 hours per week, but, I was only assigned about 20 hours to work each week, at the most.
6. Many of the cases that I was assigned were to visit homes that had already responded to the census.
7. A lot of the cases that I was assigned required the use of a proxy.
8. Toward the end of the census, supervisors kept saying that the deadline was coming, but I was not being assigned any work, even though I kept requesting assignments.
9. At one point, I was not assigned any cases for six days.


ROCHELLE TAYLOR1-21-2021
Date

Exhibit I

STATEMENT OF ANNA GECK

1. My name is Anna Geck.
2. I am a retired Detroit Public schoolteacher that worked for 30 years for the Detroit Public Schools.
3. I worked in Detroit as an enumerator for the 2020 Census.
4. I applied for the enumerator position early in 2020, but I did not receive a call letting me know that I had been hired until March 11, 2020.
5. I completed the enumerator training and began working at the beginning of August, 2020.
6. Many of the cases that I was assigned were to visit homes that had already responded to the census.
7. At least 30% of the cases that I was assigned required the use of a proxy. In at least half of these cases it was not possible to get a proxy.
8. Toward the end of the census, supervisors kept saying that the deadline was coming, but I was being given limited amount of cases, even though I kept requesting assignments. I was receiving approximately 35-45 cases daily until approximately September 20, 2020, on which day I received 7 new cases and from there I received a much more limited amount of cases.
9. Starting on October 8, 2020 I began receiving less than 10 cases per day.


ANNA GECK

01.19.2021
Date

Exhibit J

STATEMENT OF JEFF BREZA

1. My name is Jeff Breza.
2. I worked as an enumerator in both Oakland County and the City of Detroit for the 2020 Census.
3. I worked in Oakland County in August and September and then transferred to Detroit in mid-September.
4. The operation in Detroit was disorganized compared to Oakland County.
5. When I worked in Detroit, I was assigned a supervisor but was not given a phone number to call when I had questions. In Oakland County, there was an office that we could contact, and we were given a phone number to use when we had questions. There was a clear chain of command and it was easy to get cases.
6. In Detroit, we were told that we were not allowed to call the Area Census Office, but, in Oakland County, we were encouraged to call the Area Census Office.
7. Supervisors and other administrators in Detroit were often unavailable. In Oakland County I was able to reach out to and speak with the supervisors or their superiors or the ACO if I wasn't receiving cases or for further instructions regarding a specific case. This was not true of my work in Detroit.
8. I was not assigned many cases to work in Detroit and, in many of the cases I was assigned I was sent to far areas for very few cases.
9. On September 30, the completion rate was only at 60% in my zone in Detroit, so I was surprised that the count was scheduled to end.
10. When I worked in Detroit, I had to use a lot of proxies to complete cases. I would estimate that I had to use proxies 50% of the time in Detroit. In Oakland County I used proxies less frequently. On multiple occasions, while working the Census in Detroit, I was instructed by my supervisor to use myself as a proxy.
11. I worked in Detroit until the October 15 cutoff. The work was diminishing by October 15, 2020 and I was getting less cases over time as the end date approached.

JEFF BREZA

DATE

2.4.2021

Exhibit K

STATEMENT OF COIRE NICHOLS HOUSTON

1. My name is Coire Nichols Houston.
2. I worked as Partnership Specialist for the 2020 Census in Detroit. I also worked as a Partnership Assistant for the 2010 Census in Detroit.
3. As a partnership specialist, my role was to build partnerships and act as a liaison to the community on behalf of the 2020 Census.
4. In 2010, the Census Bureau assigned 15 partnership specialists to Detroit, and each one had 20 assistants working with them. For the 2020 Census, there were only two people in my position assigned to the City of Detroit, with no assistants.
5. Multiple people that I worked with during the 2010 Census applied for the same job for 2020 but were not hired. We were not given any reason why there were so few partnership specialists hired for 2020. More partnership specialists are necessary to make the count accurate. With the number of partnership specialists that were hired in 2020 it was nearly impossible to properly reach out to the citizens of Detroit to increase the response rate and get an accurate count.
6. I was specifically instructed not to contact anyone associated with the City of Detroit government. I was told to "stay in my lane" and follow my supervisor's lead.
7. My last day working as a partnership specialist was August 1, 2020. I was told I was being let go because there was no more work to be done. There was much work still to be done. The numbers of responses were still quite low when I was let go.
8. The 2020 Census operation was completely unstructured and disorganized. Leadership waited until the last minute to do anything. Phone calls and emails were not returned if I had any questions. When I did ask questions I was told to "stay in my lane" and my questions were never answered. Any suggestions I made as a native Detroitier were immediately dismissed.

CNH

COIRE NICHOLS HOUSTON

Jan 26, 2021

Date

Signature: 
Coire Nichols Houston (Jan 26, 2021 15:15 EST)
Email: cdnhouston@aol.com

Exhibit L

STATEMENT OF CHAR YATES

1. My name is Char Yates.

2. I was hired by the 2020 Census to work as a media specialist for the State of Michigan. My role was to handle media and public relations for the entire state for the 2020 Census.

3. Previously, I was hired by the 2010 Census to work as a media assistant. In 2000, I worked with then-Mayor Dennis Archer's office on the City of Detroit's census preparations.

4. From Day 1, working with the 2020 Census was far more difficult and disorganized than previous years. I was hired in December of 2018 and I was the first media specialist brought on to work in Michigan. At that time, the census was just beginning to hire partnership specialists.

5. When I went to training in Chicago in January 2019, I was told "you're only responsible for media. You have nothing to do with the City of Detroit or the Mayor. Stand down and stay in your lane." Both Marilyn Sanders, the regional director census director, and Elisa Johnson, the deputy regional director, said this to me. I attempted to explain to them that I was very connected to the City of Detroit and that I had a lot of resources and experiences that could be helpful. I was told again to focus solely on media efforts. It was made clear to me that I was not to use my connections and relationships to help ensure an accurate count in Detroit.

6. Nevertheless, I made efforts to help the census in Detroit. In 2019, I attended several meetings with the Detroit's internal census team in an effort to get to know the people that were working to build awareness of the 2020 Census. I was the only person from the Census Bureau who attended these meetings. During 2010, the Census Bureau had additional staff members present at such meetings.

7. To me, it appeared that the leadership in Chicago did not know or care what was going on with the census in Detroit. For example, the Census Bureau participated in the 2009 Detroit Thanksgiving parade in advance of the 2010 census. In 2019, I mentioned to the regional office staff that the Detroit Thanksgiving parade would be a great opportunity to increase awareness of the upcoming 2020 census. However, the regional office chose not to get involved in the 2019 parade.

8. In September of 2019, Mary Mazer and Coire Houston were hired as partnership specialists. Both Coire and Mary were told not to contact the City and not to do anything with either Mayor Duggan's office or Governor Whitmer's office. The partnership specialists were also told that they could not contact high profile Detroit institutions such as the Detroit Institute of Arts or the Charles Wright Museum.

9. I have relationships with the communications teams at Ford, General Motors and Chrysler. The team at Ford reached out to me about partnering together to promote the 2020 census. I passed the idea on to the regional staff in Chicago, but no one followed up with Ford.

10. On one occasion, Ellisa Johnson, the Deputy Regional Director from Chicago, came to the area for a meeting in Dearborn. I offered to take her to Ford's headquarters, which was across the street from our meeting location, in order to introduce her to some of the key people there. She refused my offer.

11. In early 2020, there was a meeting at the regional office in Chicago purportedly to address awareness for the census. No action items were given, and there was no direction on how we should be moving forward and getting the community engaged with the census.

12. There were 5 area census offices in Michigan: Traverse City, Troy, Macomb County, Lansing, and Detroit. These offices were very closed off and did not communicate. I

proposed doing some media events to promote the census when the offices were formally opened. However, as compared to 2010, I was only authorized to conduct a very limited amount of publicity.

13. Staff members in both Mayor Duggan's office and Governor Whitmer's office told me that it would take days for the regional office to respond to their emails or phone calls.

14. In April or May of 2020, I received a call from Marilyn Sanders and Elisa Johnson asking what I was doing to help the Census in Detroit. They specifically asked what I was doing to help the Mayor's office. I reminded them that I had been told to stay in my lane. I believe that this call was made in response to a call that the Secretary of Commerce made to Mayor Duggan's office regarding the City's low self-response rates. Despite this call, I was told that I could not attend a census drive thru/kickoff event that the City's team was holding at Martin Luther King Jr. High School. The amount of publicity authorized remained distressingly low.

15. Also in response to the Secretary of Commerce's call, the regional office put together a Detroit census task force and put Linda Clark in charge. However, based on my observations, the task force accomplish almost nothing because census field operations were on pause due to the COVID-19 pandemic.

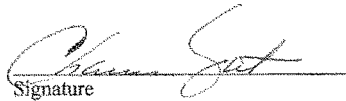
16. In late July or early August, Coire Houston was released as a partnership specialist. She was told that there was no more work to do. Mary Mazer was kept on, but she was assigned to work in Lansing.

17. In mid-September, right before the partnership team was scheduled to finish working, the regional office realized they needed more help in Detroit. Rather than re-hiring Coire, the regional office brought in 5 or 6 partnership specialists from other states to work in Detroit.

When the individuals arrived in Detroit, the regional office had not purchased any promotional materials and there was no plan of action.

18. Several of the partnership specialists who were brought in from other states came for a week and then went home, even though they were scheduled to work for two weeks. I spoke with a couple of the specialists who decided not to come back for the second week. I was told that they felt it was a waste of time to come back because there was no plan of action for them and because the partnership period was almost over.

19. Overall, the 2020 Census invested far less time, resources and effort in community outreach to Detroit than in either 2000 or 2010. In 2010, the census bureau made appearances wherever possible, including at concerts, sporting events, and the 2009 thanksgiving parade. In 2009, census staff went out and did patrols for Angels' Night before Halloween. There was a 2010 Census concert with the Whispers at the Renaissance Center in a ballroom. The Census Bureau created sweatshirts, t-shirts, coffee mugs, sewing kits, and other kinds of giveaways to create awareness of the Census. That was a far cry from the failure of 2020.


Signature

1/21/2021
Date

Exhibit M



ANALYSIS OF THE CENSUS 2020 COUNT IN DETROIT

DECEMBER 2021

By Patrick Cooney, Ren Farley, Samiul Jubaed, Kurt Metzger, Jeffrey Morenoff, Lisa Neidert, and Ramona Rodriguez-Washington¹

KEY FINDINGS

- Our data suggest the 2020 Census undercounted the number of occupied residential units in 10 Detroit Census block groups we analyzed by 8.1%.
- Detroit is an outlier compared to other U.S. cities in the extent to which its 2020 Census population and housing counts deviate from the Census Bureau's 2019 population and housing estimates.
- Data from our analysis of Census block groups and peer cities offer compelling evidence of a likely undercount of Detroit in the 2020 Census.
- Decennial population counts and annual population estimates are critically important, used to determine the allocation of hundreds of billions of dollars in federal funding to state and local governments.

EXECUTIVE SUMMARY

Each year the Census Bureau releases an official estimate of the residential population of every municipality in the nation. The Census Bureau estimated that in 2019, Detroit had a population of roughly 670,000. However, just one year later, the 2020 Census counted only 639,000 residents living in the city, a decline of roughly 31,000 residents from its 2019 estimate. In the context of the Census Bureau's previous enumerations and estimates of Detroit's population, a single-year decline of 31,000 residents is anomalous and implausible.² With such a dramatic discrepancy between the 2019 estimates and the 2020 count, it is possible that the Census Bureau either significantly overestimated Detroit's population in the years preceding 2020 or significantly undercounted the city's population in 2020.

In this report, we lay out preliminary evidence supporting the latter case, suggesting the Census Bureau undercounted Detroit's population in 2020. We present the results of an analysis of 10 block groups in Detroit, comparing the Census Bureau's count of occupied housing units in those block groups with counts from United States Postal Service data from June 2020, when the Census was taking place.³ For five of these block groups, we also present data from a canvass conducted by Wayne State University (WSU) in September and October 2021 that provides data on the overall number of housing units and the number of occupied housing units in those block groups.

Our analysis suggests the 2020 Census produced an undercount of occupied housing units in the 10 sampled block groups, including one set of five block groups with relatively high rates of residential stability and another set of five block groups with higher vacancy rates and lower rates of self-response in the 2020 Census (we refer to these block groups as "less stable").⁴ In the set of more residentially stable block groups we sampled, depending on the data source we use, the 2020 Census appears to have produced an undercount of between 223 and 277 occupied units, counting between 7.6% and 9.5% fewer occupied units.⁵ In the five less residentially stable block groups we analyzed, the 2020 Census appears to have produced an undercount of 161 units, or roughly 9% fewer units. In sum, after conducting an audit of the Census counts of residential units and occupied units in a selection of both more stable and less stable Detroit block groups, we find that the 2020 Census appears to have undercounted the number of occupied residential units across these 10 block groups by 8.1%, missing an estimated 964 Detroit residents. If undercounts of a similar magnitude occurred in a majority of the city's more than 600 block groups, the potential undercount could be in the tens of thousands.

In addition to this block group level analysis, we also analyzed other data produced by the Census Bureau, which show

Detroit as an outlier compared to other U.S. cities in the size of the discrepancy between the Census Bureau's 2019 population estimates and its 2020 population count. Given the circumstances of the 2020 Census count in Detroit (e.g., high reliance on internet self-response and abbreviated Non-Response Follow Up (NRFU) period combined with the city's hard-to-count characteristics) these data offer compelling evidence of a likely undercount of Detroit in the 2020 Census.

PRELIMINARY EVIDENCE OF AN UNDERCOUNT IN DETROIT: AN ANALYSIS OF 10 DETROIT BLOCK GROUPS

To better understand whether and to what extent there was an undercount in Detroit in the 2020 Census, the City of Detroit commissioned WSU to conduct a canvass of five Census block groups in which the vacancy rate reported in the 2020 Census was far higher than one would expect based on vacancy estimates from the 2015-2019 American Community Survey (ACS).⁶ Researchers from the University of Michigan, in collaboration with city staff, selected a set of five block groups where the counts of occupied housing in the 2020 Census were substantially lower than (a) counts of housing units with active DTE Energy (a Detroit utility provider) accounts and (b) estimated counts of occupied housing units from the 2015-2019 ACS. These five block groups also had relatively high rates of residential stability and homeownership based on 2015-2019 ACS. In short, this set of five block groups was selected to represent areas of the city where it should have been relatively easy to produce accurate population counts—because they have high rates of residential stability and a preponderance of single-family, owner-occupied homes (2015-2019 ACS)—and yet

the 2020 Census produced anomalously low rates of occupied housing. If the 2020 Census inaccurately classified a substantial number of occupied housing units in these areas as vacant, this would translate into a substantial undercount of the population.

The WSU team canvassed these five block groups to count the total number of housing units and determine the occupancy/vacancy status of each housing unit. Canvassers were trained to determine the occupancy status of a housing unit based on physical characteristics of the structure (e.g., car in the driveway, lights on in the home), and, when occupancy status was ambiguous, talk to possible occupants of the housing units and/or neighbors.

One issue with comparing data on housing occupancy from the 2021 WSU canvass to the 2020 Census is that housing conditions may have changed in the elapsed time between the Census enumeration and the canvass. To address this limitation, we drew upon a third data source—the United States Postal Service (USPS) Delivery Sequence File from June 2020—that also provides counts of occupied housing in the sampled block groups from a time period that is contemporaneous with the 2020 Census.⁷

RESULTS IN STABLE BLOCK GROUPS

Figure 1 below shows the occupancy rate for each of the five residentially stable block groups we inspected, by data source. Across all five block groups,⁸ occupancy rates as measured by the WSU canvass and USPS data are between 6.2% and 15% higher than occupancy rates measured by the Census, with a high degree of similarity in the rates obtained by the two non-Census sources.⁹

FIGURE 1: ESTIMATED OCCUPANCY RATES IN SELECT STABLE BLOCK GROUPS

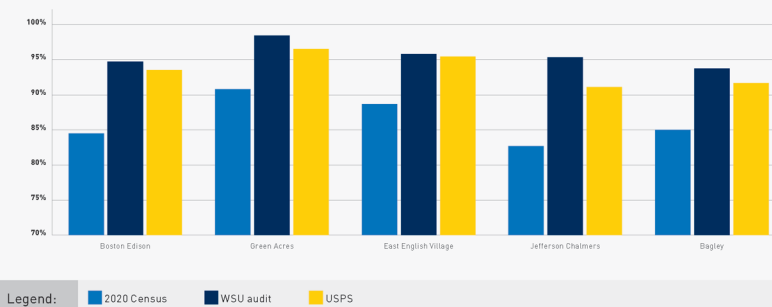


TABLE 1: COUNT OF OCCUPIED HOUSING UNITS IN SELECT STABLE BLOCK GROUPS BY SOURCE OF COUNT

NEIGHBORHOOD/ BLOCK GROUP	2020 CENSUS	WSU CANVASS	USPS	DIFFERENCE (WSU - CENSUS)	% UNDERCOUNT (WSU)	DIFFERENCE (USPS - CENSUS)	% UNDERCOUNT (USPS)
Boston Edison	399	484	478	85	17.6%	79	16.5%
Green Acres	474	500	490	26	5.2%	16	3.3%
East English Village	911	969	965	58	6.0%	54	5.6%
Jefferson Chalmers	459	522	499	63	12.1%	40	8.0%
Bagley	486	531	520	45	8.5%	34	6.5%
TOTAL	2729	3006	2952	277	9.2%	223	7.6%

In Table 1, we show these counts by block group and source of count. In each block group, the USPS and WSU data suggest an apparent Census undercount of between 16 and 85 occupied units. In total, the WSU data suggest a Census undercount of 277 occupied units across these five block groups (9.2% fewer occupied units), and the USPS data suggest an undercount of 223 occupied units (7.6% fewer occupied units).¹⁰

RESULTS IN LESS RESIDENTIALLY STABLE BLOCK GROUPS

In addition to analyzing the count of residential units and occupied residential units in residentially stable block groups, we also conducted an analysis of occupied residential units in five block groups with high vacancy rates and low rates of self-response on the 2020 Census. If the first set of block groups should have been easy to count, this second set of block groups were chosen to understand the potential for an undercount in block groups where it may have been harder to achieve an accurate count.¹¹ Our suspicion was that we were likely to see a larger undercount in these less residentially stable neighborhoods, given their hard-to-count features. For this second set of block groups we do not have WSU canvassing data, so rely only on USPS data.

Given the reliance on internet self-response in the 2020 Census (discussed below), and the ways in which the count may be vulnerable to inaccuracies in areas with low self-response rates, we chose five block groups to analyze based on the following criteria: (a) the Census tract in which the block group is nested had a self-response rate below 40%;¹² (b) the Census 2020 count of housing units was within +/- 10% of the count of housing units based on City of Detroit Property Assessment data, to reduce the likelihood of analyzing a block group with many large multifamily properties;¹³ and (c) the number of active DTE energy accounts was larger than the number of occupied units counted by the Census Bureau, again to reduce the likelihood of analyzing a block group with a

large number of multifamily properties.¹⁴ This set of five block groups also had a much higher vacancy rate (average rate of 38.5%) in the 2020 Census than the initial set of five block groups we selected (average rate of 13.7%).

For these five block groups we can only produce a count of occupied residential units, not a count of total residential units. This is because the USPS data only yields reliable counts of occupied units and is less reliable in counting uninhabitable housing units.¹⁵

Still, given that our main focus is the count of occupied housing units in each block group, the USPS data from June 2020 offer a helpful comparison to the 2020 Census figures. The results of our analysis are summarized in Table 2 below.

TABLE 2: COUNT OF OCCUPIED HOUSING UNITS IN SELECT LESS STABLE BLOCK GROUPS

NEIGHBORHOOD/ BLOCK GROUP	2020 CENSUS	USPS	DIFFERENCE (USPS - CENSUS)	% UNDER-COUNT
Dexter-Linwood	333	365	32	8.8%
Franklin	344	352	8	2.3%
LaSalle-College Park	462	510	48	9.4%
Islandview	238	274	36	13.1%
Virginia Park	239	276	37	13.4%
TOTAL	1616	1777	161	9.1%

Our initial hypothesis was that if there was a potential Census undercount, it would be greater in these less residentially stable block groups than in the more stable block groups analyzed above. This hypothesis is borne out by the data, which show that the Census counted 9.1% fewer occupied units than USPS in these block groups, a slightly greater undercount than we found among the more residentially stable block groups (see Table 1), where USPS data suggested that 7.6% of occupied units in those areas were not counted by the 2020 Census.

A potential undercount of this magnitude is not trivial. We used the results from the audit study to project how many people may have been undercounted in the sampled block groups based on the discrepancy between the USPS data and 2020 Census in their counts of occupied housing units. The results are shown in Table 3. We created an estimate of residents living in the ten block groups according to USPS data (column 5) by multiplying the number of estimated occupied units (column 4) by the number of people per occupied housing unit in the sampled block groups (column 3). We express the projected undercount in terms of the number of people we expect were not counted (column 6) and the percentage of the population (as estimated by USPS data) of the sampled block groups who were not counted (column 7). Aggregating across all 10 sampled block groups, we project the Census undercounted these areas by 964 people, equivalent to 8.14% of the estimated population of these areas. The projected undercount was slightly higher in 5 block groups with lower levels of residential stability (9.1% of the estimated population) compared to those with higher levels of residential stability (7.6% of the estimated population). While we can't say for certain the extent to which results from these block groups are generalizable to the rest of the city, if undercounts of a similar magnitude are found in a majority of the city's more than 600 block groups, the ultimate size of a potential undercount could be in the tens of thousands.

These block group audits offer compelling evidence of a likely undercount in Detroit, particularly when paired with additional data on the size of the discrepancy between the Census Bureau's 2019 population estimate and 2020 count, and the

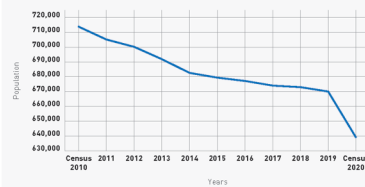
unique circumstances of the 2020 Census. We review this additional data in the following pages.

THE DISCREPANCY BETWEEN THE 2019 ESTIMATE AND 2020 COUNT OF POPULATION AND HOUSING

Each year the Census Bureau releases an official estimate of the residential population of every municipality in the nation. Though the annual population figures are estimates, they are generally quite accurate—indeed, federal funds are distributed to states and localities based on these annual estimates.¹⁶ Therefore, we would expect the trend line in annual population estimates to align fairly well with the decennial Census count.

However, as noted above, Detroit's 2020 count diverges significantly from prior estimates. Figure 2 shows that Detroit's population was estimated to have declined each year since the 2010 Census, but the rate of that decline slowed substantially since 2016. The Census Bureau estimated an average annual population decline of 0.9% between 2011 and 2016, and just 0.4% between 2016 and 2019. The decline from 2019 to 2020—a nearly 5% drop in the city's population—is out of line with recent trends, as well as with the discrepancies we see in 2019 estimates and 2020 counts in other U.S. cities.

FIGURE 2: CENSUS BUREAU COUNTS AND ESTIMATES OF DETROIT'S POPULATION 2010 TO 2020



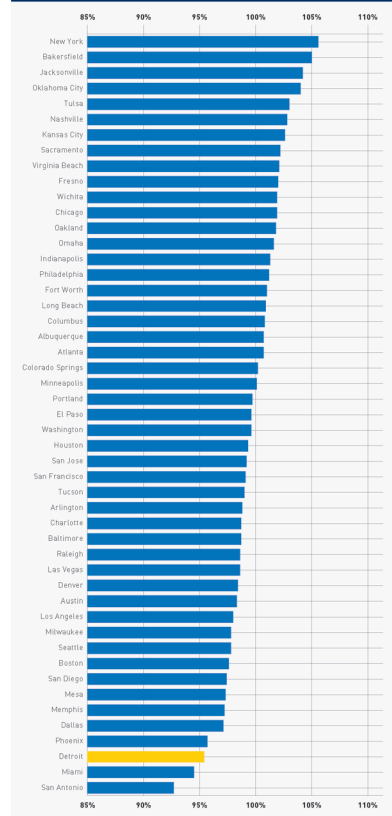
Source: U.S. Census Bureau

TABLE 3: ESTIMATED POPULATION UNDERCOUNT IN 10 DETROIT BLOCK GROUPS

SAMPLE OF BLOCK GROUPS	(1) # PEOPLE: 2020 CENSUS	(2) # OCCUPIED UNITS: 2020 CENSUS	(3) PEOPLE PER OCCUPIED UNIT: 2020 CENSUS	(4) # OCCUPIED UNITS: USPS	(5) # PEOPLE: USPS	(6) PROJECTED POPULATION UNDERCOUNT	(7) PROJECTED UNDERCOUNT (POPULATION) AS A PERCENTAGE OF USPS ESTIMATE
5 block groups with high residential stability	6685	2729	2.4	2952	7231	566	7.6%
5 block groups with low residential stability	4197	1616	2.6	1777	4615	418	9.1%
TOTAL	10882	4345	2.5	4729	11846	964	8.1%

In Figure 3 we show the 2020 Census count for the 50 largest U.S. cities as a percent of the Census Bureau's July 2019 estimate of their population.

FIGURE 3: A COMPARISON OF THE 2020 CENSUS COUNT AND 2019 POPULATION ESTIMATES FOR LARGEST 50 U.S. CITIES



5 Source: U.S. Census Bureau

Phoenix, Detroit, Miami, and San Antonio are distinguished from the other 46 large cities, with counts that came in 4% or more below the Census Bureau's 2019 estimate. Of these cities, however, Detroit is the only one that does not have a large foreign-born or non-citizen population (see Table 4). There was great controversy over the efforts to add a citizenship question to Census 2020. Given the attention on this issue, it is reasonable to expect that undocumented persons and citizens living in households with undocumented relatives would be reluctant to respond to Census 2020, leading to a potential undercount in these cities.¹⁷ But this does not help to explain the undercount in Detroit, which has far fewer people who are foreign born or non-U.S. citizens than these other cities.

TABLE 4: % FOREIGN BORN AND % NOT U.S. CITIZEN IN HIGH-DISCREPANCY CITIES

CITY	% FOREIGN BORN	% NOT U.S. CITIZEN
Miami	58.4%	28.4%
Phoenix	20.1%	12.4%
San Antonio	14.1%	8.7%
Detroit	6.1%	3.5%

Source: ACS 2019 1-year estimates

Perhaps unsurprisingly given the population figures, we also see a large discrepancy between the Census Bureau's 2019 estimate and 2020 count of housing units in Detroit. In 2010, the Census counted 349,000 housing units in Detroit. To prepare for the decennial enumeration, the Census Bureau develops a Master Address File (MAF), compiled using USPS data and commercial mailing lists. Roughly three years before the enumeration, the Census Bureau shares information with local governments in their Local Update Census Address Operation (LUCA), and local governments may challenge or update the MAF developed by the Census Bureau. In 2018, officials from the Detroit Planning Department provided the Census Bureau with an address file showing roughly 368,000 residential units—occupied or vacant—in the city.

The American Community Survey provides estimates of housing units for each municipality of 65,000 or more residents on an annual basis. The City of Detroit's estimate of 368,000 residential units is very close to the Census Bureau's estimate of 364,000 residential units from the 2017 ACS. By

2019, the Census estimate had fallen slightly, to 359,000 units. But 2020 Census enumerated only 310,000, suggesting a single year decline of nearly 50,000 housing units.

DETROIT'S POPULATION AND HOUSING COUNTS COMPARED TO INDUSTRIAL CITIES IN THE MIDWEST AND NORTHEAST

In addition to comparing Detroit to other large cities, we also narrowed our focus to compare the discrepancy between Detroit's 2019 estimates and 2020 counts with other industrial cities in the Midwest and Northeast, some of which, like Detroit, have also experienced population decline over the past 50 years. Perhaps the discrepancy we see in Detroit is also present in these other peer cities.

Here too, however, Detroit is an outlier. Table 5 shows the Census 2020 population and housing counts and the 2019 estimates in Detroit and other peer cities, including high poverty cities with large shares of Black residents, such as Cleveland and St. Louis.¹⁹ The difference between Detroit's 2020 count and 2019 estimate, at 4.6%, is more than twice the gap of the next closest city, Cleveland (2.2%). The housing discrepancy is even greater, with Detroit's nearly 14% gap more than three times Cleveland's gap of 4.3%.

In any given Census, certain populations—including people of color, immigrants, children, and low-income households—are harder to count, for a variety of reasons.²⁰ However, other cities that share certain hard-to-count characteristics with Detroit—such as high rates of poverty or large shares of residents of color—did not experience the same discrepancy between 2019 estimate and 2020 count we see in Detroit. Rather, Detroit's circumstances appear unique.

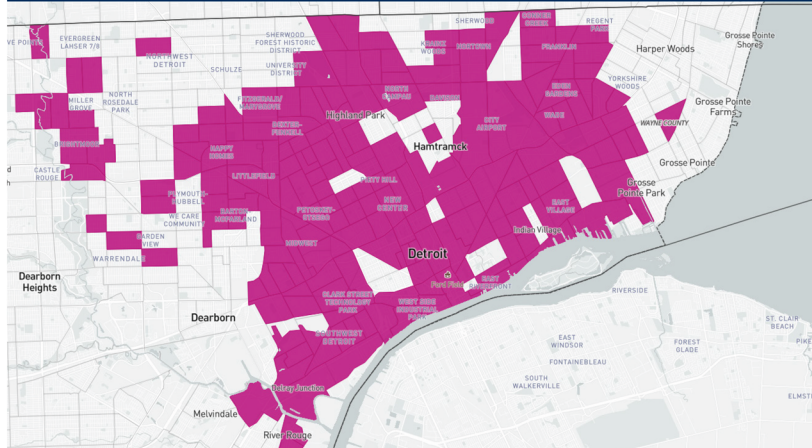
THE SPECIFIC CHALLENGES OF TAKING A CENSUS IN DETROIT IN 2020

Adding to the difficulties of obtaining an accurate count in Detroit in 2020, the 2020 Census for the first time placed significant reliance on households self-reporting information through the internet.²⁰ The reliance on internet-based self-reporting was likely to present a particularly large obstacle in Detroit, one of the "least-connected" big cities in the country.²¹ The map below (Figure 4) shows all the tracts in Detroit in which the self-response rate on the 2020 Census was in the bottom 20% of all Census tracts nationally. As one can see, much of the city falls into this bottom fifth. Indeed, Detroit had the lowest self-response rate among all cities with at least 500,000 residents.²²

TABLE 5: POPULATION AND HOUSING 2020 COUNTS AND 2019 ESTIMATES IN DETROIT AND INDUSTRIAL CITIES

CITY	POPULATION 2020	HOUSING 2020	POPULATION 2019	HOUSING 2019	POPULATION 2020/ POPULATION 2019	HOUSING 2020/ HOUSING 2019
Detroit	639,111	309,913	670,052	359,623	0.954	0.862
Cleveland	372,624	198,871	380,989	207,813	0.978	0.957
St. Louis	301,578	173,479	300,576	177,400	1.003	0.978
Milwaukee	577,222	257,723	590,157	260,024	0.978	0.991
Boston	675,647	301,702	694,295	303,791	0.973	0.993
Pittsburgh	302,971	157,695	300,281	158,561	1.009	0.995
Baltimore	585,708	293,249	593,490	293,877	0.987	0.998
Cincinnati	309,317	158,773	303,954	158,394	1.018	1.002
Kansas City	508,090	241,949	495,278	238,547	1.026	1.014
Columbus	905,748	415,456	902,073	402,520	1.004	1.032
Minneapolis	429,954	199,143	429,605	192,708	1.001	1.033

6 Source: U.S. Census Bureau

FIGURE 4: DETROIT CENSUS TRACTS IN THE BOTTOM 20% OF TRACTS NATIONALLY IN RATE OF SELF-RESPONSE


Source: www.censusdatacountmaps2020.us

When a household fails to self-report, the Census tries to ascertain information about the household through a Non-Response Follow Up (NRFU) process. The Census Bureau first seeks to ascertain occupancy/vacancy status of a residence through high-quality administrative records. Residential units deemed vacant are supposed to receive a home visit from a Census enumerator to confirm vacancy, while most of those deemed occupied are supposed to receive a number of visits, with the goal of making contact with a household member, or, after a certain number of visits, a proxy (e.g. neighbor, landlord, etc.). If an enumerator is still unable to make contact with a member of the household, the Census Bureau may try to return to administrative records to enumerate the household, or rely on a count imputation procedure.²³ In 2020, the Census Bureau relied to a significant degree on the use of administrative records, both in a bid to reduce costs as well as out of necessity, as traditional enumeration activities began late and were cut short by the Trump administration.²⁴ Though many experts note that increased reliance on administrative records has the potential to improve accuracy and reduce costs, others find that administrative records are prone to inaccuracies, particularly for traditionally hard to count populations.²⁵

The low rate of self-response in Detroit means that the Census Bureau had to enumerate a large share of Detroit's population through the NRFU process. It is possible this impacted the accuracy of the count in Detroit, given the unprecedented reliance on administrative records and truncation of traditional NRFU activities. In short, in a year in which the Census was particularly reliant on internet self-response, and the NRFU process was abbreviated, the city's hard-to-count features may have been heightened.²⁶

CONCLUSION

Every year, hundreds of billions of dollars flow to state and local governments based on decennial Census counts and annual estimates. Attaining an accurate count is therefore critically important. This report lays out compelling evidence of a likely undercount in Detroit in the 2020 Census. After reviewing data on the extent to which Detroit was an outlier in the discrepancy between its 2019 population estimate and 2020 count, we engaged in a block group-level analysis to learn more. The magnitude of the potential undercount in these block groups, when combined with the other data we've accumulated here, provide sufficient evidence to warrant further investigation, both by researchers and government officials, to ensure the city's count is accurate.

APPENDIX

DIFFERENTIAL PRIVACY ANALYSIS

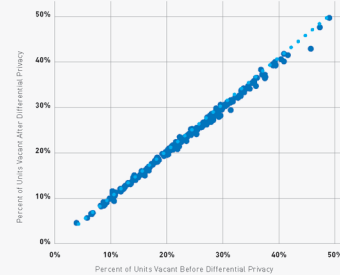
In an effort to protect the identities of Census takers, the Census Bureau deployed a technique known as differential privacy in the 2020 Census, in which random noise is inserted in the data.⁷⁷ While this may enhance privacy protections, it can also make the data imprecise at small geographies.⁷⁸ If the low Census occupancy counts in our chosen neighborhoods were the result not of an undercount but of the differential privacy procedure, then conducting an audit of those counts would be useless, as the counts would be incorrect on purpose.

To understand the impact the differential privacy procedure might have on vacancy rates at small geographies, we applied the differential privacy procedure to Detroit's 2010 Census counts at the census tract and block group levels. If the vacancy rate in a given tract or block group as reported in the 2010 Census was similar to the vacancy rate in that tract or block group after differential privacy was applied, we can assume that differential privacy does not impact the accuracy of the count of occupied and vacant units.

In the two figures below, the x-axis shows the vacancy rate of a given geography in the 2010 Census before differential privacy is applied, and the y-axis shows the vacancy rate after differential privacy is applied. Figure 1 shows this comparison at the census tract level, and Figure 2 shows it at the block group level.

At the Census tract level, differential privacy has virtually no impact on vacancy rates. At the block group level the data are a bit noisier, but the impact of differential privacy still appears to be minimal, with an average difference between pre- and post-differential privacy vacancy rates of plus or minus 2.6 percentage points. Therefore, while it's possible that the count of total and occupied units in a block group would be impacted by differential privacy and yield an artificially incorrect count, we can be reasonably confident that for most block groups in Detroit, the counts reported by the Census Bureau are quite close to the actual Census counts. This also means that if we see discrepancies in the vacancy rates between the WSU/USPS counts and the Census count, we can be reasonably confident that these represent evidence of a potential miscount in the 2020 Census in these neighborhoods, particularly if the discrepancies are large.

FIGURE 1: THE EFFECT OF DIFFERENTIAL PRIVACY AT THE CENSUS TRACT LEVEL



Source: David Van Riper, Tracy Kugler, and Jonathan Schroeder. IPUMS NHGIS Privacy-Protected 2010 Census Demonstration Data, version 20210608 [Database]. Minneapolis, MN: IPUMS. 2020.

FIGURE 2: THE EFFECT OF DIFFERENTIAL PRIVACY AT THE BLOCK GROUP LEVEL



Source: David Van Riper, Tracy Kugler, and Jonathan Schroeder. IPUMS NHGIS Privacy-Protected 2010 Census Demonstration Data, version 20210608 [Database]. Minneapolis, MN: IPUMS. 2020.

ENDNOTES

- 1 Patrick Cooney is the assistant director of policy impact at the University of Michigan's Poverty Solutions initiative; Ren Farley is a research scientist at the Population Studies Center, the Dudley Duncan Professor Emeritus of Sociology, and a lecturer at the Ford School of Public Policy, all at the University of Michigan; Samiul Jubeed is a data and policy analyst at Poverty Solutions at the University of Michigan; Kurt Metzger is the founder and director emeritus of Data Driven Detroit; Jeffrey Morenoff is a Professor in the Department of Sociology, Professor at the Ford School of Public Policy, and Research Professor in the Population Studies Center and Survey Research Center, all at the University of Michigan; Lisa Naidert is a lecturer in the Department of Sociology at the University of Michigan; Ramona Rodriguez-Washington is a program director at the Center for Urban Studies at Wayne State University.
- 2 According to previous enumerations and estimates, Detroit lost an average of roughly 8,000 residents each year from 2010 to 2014, and just 2,000 residents each year from 2014 to 2019.
- 3 A "block group" is a geography defined by the Census, consisting of a collection of Census blocks. Throughout, we will sometimes refer to the block groups we analyzed as "neighborhoods," though the geographic boundaries of the units under analysis remain the same.
- 4 U-M researchers and City officials identified five stable neighborhoods where the 2020 Census produced higher than expected vacancy rates. These more residentially stable neighborhoods were characterized by high rates of homeownership, relatively high median income, and low vacancy rates in previous Census estimates. U-M researchers also identified five less residentially stable neighborhoods to audit, prioritizing neighborhoods with low self-response rates on the 2020 Census, a proxy for a number of other measures of disadvantage. Block groups chosen for analysis also had a small discrepancy in total residential units as counted by the Census and by the City of Detroit assessor's office, and a count of active utility accounts larger than the Census count of occupied units, both to reduce the likelihood of our selecting a block group with a large number of multifamily properties.
- 5 The WSU canvassing figures showed a larger Census undercount, hence the range of estimates.
- 6 One limitation of analyzing block-group-level counts of vacant and occupied housing units in the 2020 Census is the Census Bureau intentionally added noise to these counts in an attempt to reduce the risk of disclosing the identity of individuals and households, through a process called differential privacy. To understand the impact the differential privacy procedure might have on vacancy rates at small geographies, we applied the differential privacy procedure to Detroit's 2010 Census counts at the Census tract and block group levels and found it had very little impact on this measure at these geographies, giving us more confidence in the block group audits. See the appendix for more details on our analysis of the impact of differential privacy on estimates of vacancy rates.
- 7 As an additional check on the accuracy of the USPS data, for some selection of addresses which were marked as occupied in the USPS data and vacant in the WSU data—or vice versa—we looked at Google Street View images of the property from a pre-Census and post-Census time period. For the properties we analyzed, the USPS data appear accurate. For example, the Google Street View image of a property marked vacant in the WSU data and occupied in the USPS data might show a property that in June 2019 had a maintained yard and people on the porch, but in an August 2021 image, the property appears boarded up. In addition, staff from Detroit's Land Bank Authority (DLBA) have conducted analyses comparing USPS occupancy data with neighborhood-level surveys, and found the USPS data set to be the most accurate administrative data for determining the occupancy/vacancy status of one- to four-family residential units.
- 8 The specific "stable" neighborhoods we chose to canvass were: tract 5321 block group 1 (Boston Edison); tract 5381 block group 1 (Green Acres); tract 5018 block group 1 (East English Village); tract 5133 block group 2 (Jefferson Chalmers); tract 5386 block group 4 (Bagley).
- 9 Because we used the USPS data as a check on the WSU data, the denominator for total residential housing units in the USPS occupancy rate calculation comes from the WSU data set.
- 10 Throughout the report, we calculate the percent difference between Census and non-Census data by using the non-Census estimate as the base figure.
- 11 The specific "less stable" neighborhoods analyzed were: tract 5315.02 block group 1 (Dexter-Linwood); tract 5034 block group 1 (Franklin); tract 5054 block group 2 (LaSalle-College Park); tract 5193 block group 1 (Islandview); and tract 5327 block group 1 (Virginia Park).
- 12 Self-response rates are reported at the tract level, so we chose block groups that were inside of tracts with low self-response rates.
- 13 The City parcel data codes all apartment buildings with the same code and a single entry, so if there were many more units counted in a block group by the Census Bureau than is shown in the parcel data, it could be that the Census Bureau is counting many apartments that don't show up in the parcel data. We wanted to analyze block groups with relatively few apartment buildings because City staff informed us that USPS occupancy data is most accurate for single-family homes up to four-unit buildings.
- 14 In some block groups, the number of occupied units reported by the 2020 Census is much larger than the number of active DTE accounts because a single DTE hookup may be reported for a large apartment building, for example.
- 15 While the USPS data appropriately marks some vacant lots as neither occupied nor vacant, in other instances the vacant code is applied to vacant lots, yielding this code insufficient to help us understand the total number of habitable units in a geography.
- 16 Nora Gordon and Krista O'Connell, "Why Does the Census Matter for State and Local Governments?" *Georgetown University McCourt School of Public Policy*, February 18, 2020. Available at: <https://mccourt.georgetown.edu/news/why-does-the-census-matter-for-state-and-local-governments/>
- 17 Hansi Lo Wang, "2020 Census Could Lead to Worst Undercount of Black, Latinx People in 30 Years," *National Public Radio*, June 4, 2019. Available at: <https://www.npr.org/2019/06/04/728034176/2020-census-could-lead-to-worst-undercount-of-black-latinx-people-in-30-years>
- 18 In a 2019 report by the Urban Institute, which included among its authors the new director of the Census Bureau, Robert Santos, researchers estimated that the 2020 Census—after taking into account traditional hard-to-count characteristics as well as the unique circumstances of the 2020 Census described below—could undercount Black residents in the U.S. by as much as 3.68%. Report available at: https://www.urban.org/research/publication/assessing-miscounts-2020-census/view/full_report
- 19 Alex Jones Small and Spencer Wagner, "Census 2020: How to Count Hard-to-Count Communities," *National League of Cities*, May 3, 2019. Available at: <https://www.nlc.org/article/2019/05/03/census-2020-how-to-count-hard-to-count-communities/>
- 20 Diana Elliott, Robert Santos, Steven Martin, Charmaine Runes, "Assessing Miscounts in the 2020 Census," *Urban Institute*, June 4, 2019. Available at: https://www.urban.org/research/publication/assessing-miscounts-2020-census/view/full_report
- 21 "Worst Connected Cities 2019," *National Digital Inclusion Alliance*. Available at: <https://www.digitalinclusion.org/worst-connected-cities-2019/>
- 22 Nisa Khan, "Michigan at 8th place for 2020 Census self-response, but Detroit last for large cities," *Detroit Free Press*, October 19, 2020. Available at: <https://www.freep.com/story/news/local/michigan/2020/10/19/michigan-detroit-2020-census-response/3710170601/>
- 23 Pat Cantwell, "How We Complete the Census When Households or Group Quarters Don't Respond," *United States Census Bureau*, April 16, 2021. Available at: <https://www.census.gov/newsroom/blogs/random-samplings/2021/04/imputation-when-households-or-group-quarters-dont-respond.html>

- 24 Mary H. Mulry, Tom Mule, Andrew Keller, and Scott Konicki, "Administrative Record Modeling in the 2020 Census," *United States Census Bureau*, April 27, 2021. Available at: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/plan/planning-docs/administrative-record-modeling.html>
- 25 Hansi Lo Wong, "Supreme Court Permits Trump Administration To End Census Counting Early," *National Public Radio*, October 14, 2020. Available at: <https://www.npr.org/2020/10/14/923365278/supreme-court-permits-trump-administration-to-end-census-counting-early>
- 26 Robert Santos, "Risk Factors Assessing the Fairness and Accuracy of the 2020 Census," *Urban Institute*, December 3, 2020. Available at: <https://www.urban.org/sites/default/files/publication/103306/risk-factors-affecting-the-fairness-and-accuracy-of-the-2020-census-rob-santos.pdf>
- 27 Ron Jarmin, "Redistricting Data: What to Expect and When," *United States Census Bureau*, July 28, 2021. Available at: <https://www.census.gov/newsroom/blogs/director/2021/07/redistricting-data.html>
- 28 Ibid.

Exhibit N

CODING ACCURACY SUPPORT SYSTEM CASS		SUMMARY REPORT PS FORM 3553			
S O F T W A R E	A1. CASS				
	CASS CERTIFIED COMPANY NAME FIRSTLOGIC SOLUTIONS, LLC		CONFIGURATION STD		
	CASS CERTIFIED SOFTWARE NAME & VERSION FIRSTLOGIC ACE 8.06.00.N				
	Z4CHANGE CERTIFIED COMPANY NAME		CONFIGURATION		
	Z4CHANGE SOFTWARE NAME & VERSION				
	ELOT CERTIFIED COMPANY NAME FIRSTLOGIC SOLUTIONS, LLC		CONFIGURATION STD		
	ELOT SOFTWARE NAME & VERSION FIRSTLOGIC ACE 8.06.00.N				
	A2. MASS				
	MASS CERTIFIED COMPANY NAME				
	MASS CERTIFIED SOFTWARE NAME & VERSION				
CONFIGURATION		MLOC SERIAL NUMBER			
L I S T	B1. LIST PROCESSOR TEC MAILING SOLS	B2. DATE LIST PROCESSED MASTER FILE: 16-JUN-20 Z4CHANGE: ELOT: 16-JUN-20 CRIS:	B3. DATE OF DATABASE ZIP+4 FILE: 05/2020 Z4CHANGE: ELOT: 05/2020 CRIS:		
	B4. ADDRESS LIST NAME OUTPUT.TXT	B5. NUMBER OF LISTS 1	B6. TOTAL ADDRESSES 448140		
	CASS OUTPUT RATING		VALIDATION PERIOD FROM TO		
	C1. RECORDS ZIP4/DPV CONFIRMED	340637	06/16/2020 12/13/2020		
O U T P U T	C2. RECORDS Z4CHANGE PROCESSED	0	XXXXXXXXXX XXXXXXXXXX		
	C3. RECORDS 5-DIGIT CODED	448140	06/16/2020 06/16/2021		
	C4. RECORDS CR RT CODED	445046	06/16/2020 09/14/2020		
	C5. RECORDS ELOT ASSIGNED	340637	06/16/2020 09/14/2020		
	D1. SIGNATURE OF MAILER		D2. DATE SIGNED		
M A I L E R	I CERTIFY THAT THE MAILING SUBMITTED WITH THIS FORM HAS BEEN CODED (AS INDICATED ABOVE) USING CASS CERTIFIED SOFTWARE MEETING ALL OF THE REQUIREMENTS LISTED IN THE DMM SECTION 602.		D3. NAME & ADDRESS OF MAILER		
	FOR INFORMATIONAL PURPOSES ONLY: QSS IS SOLELY MADE AVAILABLE FOR THE LIST PROCESSOR'S REVIEW AND ANALYSIS. THIS INFORMATION IS NOT TO BE CONSIDERED BY U.S. POSTAL SERVICE PERSONNEL IN DETERMINING RATE ELIGIBILITY UNDER ANY CIRCUMSTANCES.				
Q S S	HIGH RISE DEFAULT	HIGH RISE EXACT	RURAL ROUTE DEFAULT	RURAL ROUTE EXACT	LACSLINK
	1645	63076	0	0	0
	EWS	SUITELINK			
	0	0			

FIRSTLOGIC SOLUTIONS, LLC - PS FORM 3553, SEPTEMBER 2017
THIS FORM AVAILABLE ON THE WEB AT [HTTP://ABOUT.USPS.COM/FORMS/ALL-FORMS.HTM](http://about.usps.com/forms/all-forms.htm)
PHYSICAL SOURCE FIELD:

Exhibit 2



Mayor's Office

Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 1126
Detroit, Michigan 48226

Phone 313•224•3400
Fax 313•224•4128
www.detroitmi.gov

June 30, 2022

Electronic Submission via Secure Web Incoming Module ("SWIM") Portal

United States Census Bureau
National Processing Center
ATTN: CQR Geography Bldg. 63E
1201 E 10th Street
Jeffersonville, IN 47132

**Re: City of Detroit 2020 Census Count Question Resolution Operation Submission –
Housing Count Case – Supplemental Submission**

To the Census Count Question Resolution Office – Attn. Ms. Mel Troxell:

The City of Detroit ("Detroit" or the "City") appreciates the opportunity to provide supplemental information to support its Count Question Resolution Operation ("CQR") Housing Count Case submission. The City has made this a top priority, undertaking copious analysis of housing counts as well as quality control checks of our findings, with assistance from independent experts. The data presented in this supplemental submission establish an undercount of housing units in Detroit in the 2020 Census, and address the central goal of the CQR process: allowing the Census Bureau to correct processing errors in its housing count for the City.

Background on Detroit's CQR Submission

On March 30, 2022, the City filed its CQR submission, challenging the 2020 Census undercount of valid housing units and associated population in the City of Detroit. On April 5, the Bureau responded by email to the City's submission, requesting additional documentation supporting the City's case. Specifically, the Bureau requested:

- Supporting documentation that discusses and certifies the accuracy and validity of the source materials used to prepare the case by including information on the creation date/timeframe, usual use, and maintenance cycle[.]
 - Source(s) to revise the housing counts must include the addresses as of April 1, 2020. More recent source material must include a way to determine the addresses that were valid on April 1, 2020.

In a subsequent email message on April 18, the Bureau provided further clarification and context regarding information needed from the City that was useful in focusing our review, specifically:

We are looking for additional information about the City of Detroit's ("the City's") data source for the addresses that were compared to the USPS spring 2020 dataset for use in your CQR case – how and when the City's address data were compiled and updated, and for what purpose. For example, were the address data from the City's tax records, utilities records, or E-911 records? How long have these address source records been in existence, and what is their typical maintenance cycle?

The Bureau requested that the City produce this additional documentation within 90 days – by July 4, 2022. Accordingly, the City provides the following responsive materials, describing not only the sources of the address data, but also the comprehensive visual review and validation process of imagery corresponding to each address listed in the City's CQR submission.

This supplemental submission consists of five parts:

Part I: a summary of the data sources used to compile the City's initial table of addresses, which include a variety of City departments, as well as third-party sources such as DTE Energy. Note that the table of addresses submitted with the City's March 30, 2022 CQR submission is not identical to a cumulative list of addresses from these sources; those data were further refined, as described below.

Part II: a description of the maintenance and update history of the data sources used to compile the City's initial table of addresses. Related to Part II is Appendix A, which provides additional detail from City departments on the use and maintenance cycle for each dataset.

Part III: an explanation of the City's processes for refining the data in its initial table of addresses, including use of USPS Delivery Point Validation data, de-duplication, and cross-referencing against the City's Completed Residential Demolitions dataset. This data refinement resulted in the list of 114,274 addresses on 4,350 Census blocks included in the City's March 30 CQR submission.

Part IV: a description of the City's extensive efforts to review and validate the housing unit data included in its CQR submission. In connection therewith, the City engaged a team of over 100 reviewers, who collectively spent approximately 5,500 hours analyzing street-level and aerial imagery to validate the count of inhabitable housing units as of Census Day (April 1, 2020). Moreover, the analysis involved substantial validation and quality-control processes, as described herein.

Part V: the accompanying spreadsheet, titled **cqr20_DetroitCity_PL2622000_BCL_20220629**, identifying the blocks where the City's analysis shows that the 2020 Census count did not reflect the correct number of housing units, based on the City's detailed comparison with available records and data. The spreadsheet lists 78,887 addresses with inhabitable residential units, verified using imagery analysis close-in-time before and after

April 1, 2020, on 2,990 census blocks. In comparison, the 2020 Census enumerated only 69,553 housing units on those blocks, an undercount of 9,334 housing units.¹

I. Summary of Data Sources for City's Address Table

In response to the Bureau's request for "additional information about the City of Detroit's ("the City's") data source for the addresses . . . in your CQR case," the City provides the following information:

The initial dataset compiled information from the City's Base Address File,² which includes input from:

- a. Parcel Data (2017-2019) from the City of Detroit Office of the Assessor;
- b. Building Permits (available data as of 2020) from the City of Detroit Buildings, Safety Engineering, and Environmental Department ("BSEED");
- c. Certificates of Occupancy (available data as of 2020) from the City of Detroit BSEED;
- d. Address Assignments as of 2020 from the City of Detroit Department of Public Works ("DPW");
- e. Water and Sewerage Active Account data from 2020 from the City of Detroit Water and Sewerage Department ("DWSD");
- f. Active Electric and Gas Accounts from April 2020 for the City of Detroit from DTE Energy;
- g. Affordable Housing Data (available data as of 2019) from the City of Detroit Housing and Revitalization Department ("HRD");
- h. Addresses Submitted in the Census New Construction Program (Fall 2019) from the City of Detroit Department of Innovation and Technology;
- i. Addresses from the City of Detroit Planning and Development Department compiled for the purpose of participating in the Local Update of Census Addresses Operation (2018); and
- j. 2010 Building Footprint file maintained by the Southeast Michigan Council of Governments ("SEMCOG").

II. Maintenance and Update History of Base Address File

In response to the Bureau's request for "[s]upporting documentation that discusses and certifies the accuracy and validity of the source materials used to prepare the case by including

¹ While the City's March 30, 2022 CQR submission referred to the total number of addresses on 4,350 blocks with indicia of a 2020 Census undercount based on USPS and City administrative records, in response to the Bureau's request for additional detail, our follow-up imagery-based analysis, and this supplemental submission, focus on the 78,887 addresses on 2,990 census blocks where we have amassed definitive evidence of an undercount. The City believes there was likely an undercount of residential housing units on many other census blocks, but pursuant to CQR guidelines and the Bureau's instruction, the City's case is directed to this set of addresses.

² See <https://base-units-detroitmi.hub.arcgis.com/pages/about-base-units>

information on the creation date/timeframe, usual use, and maintenance cycle,” the City provides the following information:

Historically, data on parcels, units, street addresses and buildings were maintained separately by different departments in the City of Detroit. More recently, the City’s Department of Innovation and Technology (“DoIT”) has undertaken efforts to establish a comprehensive baseline address file, coordinating information from the various departments’ systems, and enhancing processes to ensure alignment of data across departments. Listed below are key steps in DoIT’s work to establish a comprehensive City-wide baseline address file:

- In 2017, an initial address table was populated using the 2017 Parcel file from the Assessor’s Office and information in SEMCOG’s 2010 Building Footprint file.
- Beginning in 2017 and up to the present, address data for specific areas has been reviewed and validated pursuant to departmental requests. For example, as DoIT receives requests for mailing lists for Detroit’s Community Benefits Ordinance, address data for relevant areas has undergone quality-control procedures, including a comparison of the number of unit addresses within a building to its total expected count of addresses from other datasets, resolving any discrepancies.
- Beginning in 2019 and up to the present, City staff resources have been allocated to identify potential missing addresses and addresses of future housing units to improve the address database. This analysis uses datasets from many sources, including HRD, BSEED, and DPW. Field work has also been done to collect these addresses and add them to the City’s address table. Staff have also compared address locations from third-party sources, including DTE Energy and DWSD, to perform quality-control and to update the address list, connecting addresses to the correct building footprints and street segments.

As part of the CQR submission process, DoIT contacted all contributing City departments to provide additional detail on their respective maintenance and update processes for the data that were included in the City’s initial base address file. That detail is included in Appendix A to this supplemental submission.

III. Comparison of City Address File to USPS Data

Building off of the Base Address File, the City refined data on residential housing units for the purpose of its CQR submission. The City subscribes to the Mail List Cleaner service from TEC Mailing Solutions,³ which processes an existing address list to create an output of USPS data, including the deliverability status of each address. This USPS-licensed data product is called Delivery Point Validation (“DPV”).⁴ The data included in the City’s March 30 CQR submission were compiled as follows:

³ See <https://www.maillistcleaner.com/noauth/Default.aspx>

⁴ See <https://postalpro.usps.com/address-quality/dpv>

- On June 16, 2020, the City ran its table of all Detroit addresses through the Mail List Cleaner service, which added data from the May 2020 USPS ZIP4 Database, the closest-in-time to April 1, 2020 available to the City, including DPV information.
- The location of each address is the center point of the building footprint to which the address is linked in the database. The City used that location to spatially intersect the 2020 Census blocks with all of the addresses in ArcGIS.
- The City removed 139 addresses that were determined to be duplicates. These duplicate addresses were either the “building-level address” of a multi-unit building (e.g. 123 Main Street, where the building was actually comprised of 123 Main Street, Apt. 1 and 123 Main Street, Apt. 2) or instances in which the addresses referred to the same housing unit but had been written in a different manner (e.g. 123 Main Street, Apt. 2 vs. 123 Main Street, Upper).
- The City filtered the dataset to include only residential addresses that were linked to a building footprint and for which the May 2020 USPS Delivery Point Validation ‘DPV_VACANT’ data for that address was ‘Y’ or ‘N’ and was not blank (which would indicate a ‘No Stat’ address).
- The City then cross-referenced its Completed Residential Demolitions dataset (available on the City’s Open Data Portal) to the filtered dataset. The City removed 12,411 addresses of buildings that were demolished before April 1, 2020 that had a ‘DPV_VACANT’ value of ‘Y’ or ‘N’ in the May 2020 Postal Service data.
- After applying these filters, the City tabulated the number of housing units within each 2020 Census block and compared that number to the total housing unit count published by the Census Bureau.

IV. Review and Validation of Housing Count

The City’s March 30, 2022 CQR submission referenced undercounted housing units in approximately 4,350 of the City’s census blocks. In response to the Bureau’s April 5, 2022 request for additional information related to the City’s CQR submission, the City undertook an extensive review of publicly-available imagery to verify the number of residential housing units in the census blocks referenced in its CQR submission, as of April 1, 2020. To that end, the following series of steps were taken:

Step 1: Initial Validation

- A team of reviewers examined publicly available images for each specific address listed in the City’s CQR submission, using Google Maps Street View and/or Detroit Street View,⁵ of buildings located within the set of Census blocks identified in the CQR submission.

⁵ Detroit Street View is a project run by DoIT. The City collects 360-degree imagery data for use by residents, other City departments and the general public. The data are owned by the City of

- 106 individuals worked approximately 4,500 hours to review 114,274 addresses contained in 4,350 census blocks.⁶
- When the reviewers encountered images of structures that contained residential housing, they used the following Census Bureau guidelines to determine whether such structures should be included or excluded from the count of residential housing:
 - Both occupied and vacant units are counted, except that the following are excluded if they are vacant: (a) tents, caves, boats, railroad cars, and the like; (b) structures intended for nonresidential use; (c) units used for business storage (storage of personal furniture does not disqualify a unit); and (d) units unfit for human habitation (roof, walls, windows, or doors no longer protect the interior from weather), or there is positive evidence, such as a sign on the house or block that the unit is to be demolished or is condemned.⁷
- When, pursuant to these Bureau guidelines, structures were deemed inhabitable, they were included in the cumulative count observed in each block.
- Reviewers were asked to locate and examine two images for each address: one that was closest in time prior to April 1, 2020, and another that was closest in time after April 1, 2020. Cases in which the reviewer's assessment of whether there was inhabitable housing at the address differed in the "before" and "after" images were flagged for further investigation as part of the quality control process explained below.

Step 2: Quality Control

Following the initial validation, the City took additional steps to ensure the completeness and accuracy of its housing unit count:

1. Manual QC validation: A team of 47 reviewers who were trained and contributed to the initial validation were re-trained to perform quality control on various samples of the 114,274 addresses. Quality control was performed using both the initial Google Street View and Detroit Street View imagery, and also using oblique aerial imagery, used by Detroit's Office of the Assessor, that provides an aerial view of properties in April 2020.

The 360-degree oblique aerial imagery can be used to more easily validate whether structures have no roof, walls, and in some cases windows or doors, to correctly classify a structure as inhabitable or uninhabitable. The imagery is accessed using Pictometry ConnectExplorer software. This software was not initially used to validate addresses

Detroit and are provided to residents and other interested parties for free. These data are collected and updated twice per year.

⁶ Approximately 1,000 additional hours were spent on quality control processes, as described below.

⁷ See the Census Bureau's "Definitions" document on its Housing Vacancies and Homeownership (CPS/HVS) website: <https://www.census.gov/housing/hvs/definitions.pdf>

because it does not contain publicly available imagery, it is comparatively harder to navigate than Google Street View and Detroit Street View, and the number of licenses available to the City is limited.

2. Google validation: The City engaged Google to apply an algorithm to its Street View imagery captured between May 2019 and September 2019 to confirm through computer processes whether all addresses in the full set of 114,274 had structures on them. This work resulted in bulk validation of addresses recorded with no inhabitable housing.
3. Mixed-use unit validation: The City partnered with researchers from Wayne State University to visit addresses related to parcels coded by the Office of the Assessor as ‘Mixed-Use’ to identify and remove any commercial addresses from the address list.

During the quality control process, images did not display initial reviewers’ habitability determinations in order to avoid bias. QC reviewers also did not know the reason any particular address was included in the samples being reviewed.

The quality control process involved conducting a second-round of rating on a subset of the 114,274 address, which were sampled according to the following guidelines:

- a. **All addresses where inhabitability could not initially be determined.** In some cases, inhabitability could not be determined during initial validation due to contradictory imagery before and after April 1, 2020 (e.g., the “before” image appears inhabitable, but the “after” image appears uninhabitable), or because there were obstructed views of the property before or after April 1, 2020 (e.g., a tree or a car is blocking the view of the property that would help determine inhabitability).
- b. **Random samples of ten addresses from each initial reviewer – five that were rated as inhabitable and five that were rated as uninhabitable.**⁸ The purpose of this sample was to validate whether identification of inhabitable housing was more consistent than identification of housing rated as uninhabitable. Review of this sample showed that inhabitable housing was confirmed more consistently than uninhabitable housing. This informed the second sample that was quality-controlled, which focused on a sample of addresses identified as uninhabitable.
- c. **Addresses rated as uninhabitable for reasons identified as “no roof,” “no doors,” or “no windows.”** This process was implemented after performing QC on a sample of addresses rated uninhabitable. Random samples were pulled of addresses rated uninhabitable due to the status of roofs, doors, windows, or walls. QC reviewers found that for those structures identified as uninhabitable, it was more likely that the determination would be reversed (and the structure would correctly be identified as inhabitable) if the reason for uninhabitability was the status of the roof, then the front

⁸ Some reviewers had not encountered five addresses that were rated as uninhabitable. In such cases, we sampled all of the uninhabitable addresses that these reviewers had rated.

door, then windows, in that order. Thus, the quality control effort prioritized addresses rated uninhabitable based on the likelihood of an incorrect initial rating.

- d. **Addresses rated as “no residential structure” where Google validation indicated a structure at that location.** Imagery from April 2020 was used to determine if the original rating or the Google validation was correct, and if the address met the Bureau criteria for a housing unit.
- e. **Rating standardization for addresses within multi-unit buildings.** After results from the aforementioned quality control and rating steps were merged, for any addresses where different units within a multi-unit building were assigned different habitability ratings, a final review using April 2020 imagery applied a single determination to all units in that building.

Quality control results were compared and merged with the initial validation datasets using the unique ID of each address.⁹ Following the conclusion of quality control processes, the research team counted the number of residential housing units observed in each block and compared the results to block-level housing unit counts from the 2020 Census.

V. Description of the Data Table

Accompanying this submission is the spreadsheet **cqr20_DetroitCity_PL2622000_BCL_20220629**, listing blocks where the City’s analysis shows that the 2020 Census count did not reflect the correct number of housing units, based on the City’s detailed comparison with available records and data, as described herein. The spreadsheet lists 78,887 addresses with inhabitable residential units, verified using imagery analysis close-in-time before and after April 1, 2020, on 2,990 census blocks. In comparison, the 2020 Census enumerated only 69,553 housing units on those blocks, an undercount of 9,334 housing units.

The spreadsheet also includes links to Google and Detroit Street View imagery for each specific address. For addresses requiring aerial image verification, the City is able to provide Pictometry ConnectExplorer software login credentials upon request.

Conclusion

As noted in the City’s March 30, 2022 CQR submission, Census Bureau guidelines provide that housing count cases “may result in the addition of specific housing identified during the census process, but erroneously excluded from enumeration.”¹⁰ The City’s comparison of the 2020 Census count against high quality administrative records, reviewed and verified by exhaustive imagery analysis “date-stamped” to April 1, 2020, provides ample evidence that the Bureau severely undercounted the number of residential housing units in the City, thus erroneously excluding that housing from enumeration. The University of Michigan study described in detail

⁹ See Appendix B for detail regarding the process of merging datasets with the initial validation.

¹⁰ CQR Participant Guide at *xi*.

and appended to the City's March 30 submission shows that the 2020 Census undercounted the number of *occupied* residential units in Detroit as well. While Bureau guidelines dictate that governmental units "can only request a review of housing counts during 2020 Census CQR . . . [t]hey cannot request a review of population counts,"¹¹ it is abundantly clear that the 2020 Census undercounted the total population of the City of Detroit, having missed both *occupied* housing units and *total* housing units, and thus failing to count tens of thousands of Detroit residents.

The Census Bureau has described the 2020 Census as one that faced historic and "unprecedented challenges." The Bureau itself acknowledged a significant undercount in the nation's Black and Hispanic populations.¹² The information provided in the City's CQR submission and the supplemental information provided today clearly establish the substantial undercount that took place in Detroit. Therefore, the Bureau should make appropriate upward adjustments to Detroit's housing unit count and to the associated population within the City.¹³

Respectfully submitted,



Michael E. Duggan, Mayor

¹¹ *Id.*

¹² See quotations from Census Bureau director Robert L. Santos in "2020 Census Undercounted Hispanic, Black and Native American Residents," THE NEW YORK TIMES, March 10, 2022, available at https://www.nytimes.com/2022/03/10/us/census-undercounted-population.html?campaign_id=60&emc=edit_na_20220310&instance_id=0&nl=breaking-news&ref=cta®i_id=132964033&segment_id=85228&user_id=5b1d03a7673762433c16086f0b9bde5

¹³ The Bureau's 2020 Census Detailed Operational Plan for Count Question Resolution (CQR) Operation, at page 26, states that corrected housing unit data "when validated by POP [the Bureau's Population Division], are used to update population counts and issue new POP count certificates for each affected GU [governmental unit]." Based on the foregoing analysis showing that the 2020 Census undercounted at least 9,334 housing units in Detroit, a corresponding updated population count should be issued for the City. Taking into account *only* this figure, and applying the 2020 Census' City-wide occupancy rate of 82.04%* and City-wide persons-per-occupied unit figure of 2.47,** this analysis demonstrates an undercount of *at least* 18,900 people. In fact, the undercount was likely much higher because, as the University of Michigan study showed, the 2020 Census undercounted the number of *occupied* residential units – resulting in a City-wide occupancy rate that is much too low. The Bureau should take all of these factors into account in making an upward adjustment to the City's population.

* 254,275 (occupied housing units enumerated in 2020 Census) / 309,913 (total housing units)

** (639,111 (Detroit population enumerated in 2020 Census) – 11,426 (group quarters population)) / 254,275

Appendix A. City of Detroit Address Table Data Sources - Creation and Maintenance Details

Creation and maintenance details are provided below for each of the following inputs to the City's Base Address File.¹⁴

- a. Parcel Data (2017-2019) from the City of Detroit Office of the Assessor;
- b. Building Permits (available data as of 2020) from the City of Detroit Buildings, Safety Engineering, and Environmental Department ("BSEED");
- c. Certificates of Occupancy (available data as of 2020) from the City of Detroit BSEED;
- d. Address Assignments as of 2020 from the City of Detroit Department of Public Works ("DPW");
- e. Water and Sewerage Active Account data from 2020 from the City of Detroit Water and Sewerage Department ("DWSD");
- f. Active Electric and Gas Accounts from April 2020 for the City of Detroit from DTE Energy;
- g. Affordable Housing Data (available data as of 2019) from the City of Detroit Housing and Revitalization Department ("HRD");
- h. Addresses Submitted in the Census New Construction Program (Fall 2019) from the City of Detroit Department of Innovation and Technology;
- i. Addresses from the City of Detroit Planning and Development Department compiled for the purpose of participating in the Local Update of Census Addresses Operation (2018); and
- j. 2010 Building Footprint file maintained by the Southeast Michigan Council of Governments ("SEMCOG")

¹⁴ See <https://base-units-detroitmi.hub.arcgis.com/pages/about-base-units>.

a. Parcel Data (2017-2019) from the City of Detroit Office of the Assessor;

Use	To value all real and tangible personal property in the City of Detroit
Creation date	The Assessment Roll is continuous. In its current electronic format, the City went to a mainframe application in the late 1970's/early 1980's and migrated to the current system in the 2002/2003 timeframe.
Storage	On city-maintained servers.
Records added	Changes to the Assessment Roll occur at the March Board of Review. There are a variety of factors that could lead to a new parcel being created. From a practical standpoint, less than 1/20 th of one percent of the real property roll is newly created annually.
Records updated	Building attributes and taxpayer information is updated as needed. Valuation changes at the March Board of Review, mutual mistakes of fact and clerical errors are addressed at the July and December Board of Review. State Tax Commission and Michigan Tax Tribunal orders are processed when received and as ordered.
Records removed or retired	Records are retired when the legal description and value(s) are merged into a new or different parcel identifier. They are removed in the following year's database.

b. Building Permits (available data as of 2020) from the City of Detroit Buildings, Safety Engineering, and Environmental Department ("BSEED");

Use	To record all building permits in the City of Detroit.
Creation date	With the creation of Accela in December 2018.
Storage	The data is stored in Accela and there have not been any major changes to how and where the data is stored.
Records added	New records are added to this dataset via permit applications upon approval, request for services, applications for use, and code enforcement inspections.
Records updated	Records are updated in this dataset upon inspections, change, and approvals.
Records removed or retired	Records are never removed or flagged as retired from this dataset. The permits exist for the life of the building unless a change occurs requiring another permit application. Records are disabled upon demolition of the property.
Reference documentation	See below for an example of an approved building permit application with associated permits issued.

Example Building Permit Data

RECORD ID	STREET NBR	STREET DIRECT	STREET NAME	CITY	STATE	ZIP	Permit Type	Current Legal Use	Proposed Use	Units	Stories	Estimate Cost	Permit DESCRIPTION	DATE Submitted	Permit Issued Date
BLD2021-05797	1901E		Lafayette	DETROIT MI	48207	New	Townhouse (Condominium)	Townhouse (Condominium)	4	1	1	174000	Erect superstructure for attached Townhouse Condominium on previously approved Foundation per plans (AKA 1057 Hampton Circle Unit 48). See BLD2020-05151 for Foundations. Subject to Field Approval and all Applicable Federal, State, and Local Executive Orders.	9/27/2021	12/22/2021
BLD2021-05808	1901E		Lafayette	DETROIT MI	48207	New	condo	condo	4	1	1	174000	Erect superstructure for attached Townhouse Condominium on previously approved Foundation per plans (AKA 1063 Hampton Circle Unit 49). See BLD2020-05151 for Foundations. Subject to Field Approval and all Applicable Federal, State, and Local Executive Orders.	9/27/2021	12/20/2021
BLD2021-05809	1901E		Lafayette	DETROIT MI	48207	New	Townhouse (Condominium)	Townhouse (Condominium)	1	1	1	174000	Erect superstructure for attached Townhouse Condominium on previously approved Foundation per plans (AKA 1061 Hampton Circle Unit 50). See BLD2020-05151 for Foundations. Subject to Field Approval and all Applicable Federal, State, and Local Executive Orders.	9/27/2021	12/20/2021
BLD2021-06363	4273		15TH	DETROIT MI	48208	New	Single-Family Dwelling	Single-Family Dwelling	1	2	1	41180	Construct 35' L x 20' W Two Story Single-Family Dwelling (Slab on Grade) per plans. Subject to Field Approval and all Applicable Federal, State, and Local Executive Orders.	10/17/2021	12/22/2021

c. Certificates of Occupancy (available data as of 2020) from the City of Detroit BSEED;

Use	To record all Certificates of Occupancy in the City of Detroit.
Creation date	With the creation of Accela in December 2018.
Storage	The data is stored in Accela and there have not been any major changes to how and where the data is stored.
Records added	Records are updated in this dataset when the customer requests the Certificate of Occupancy and the building permit has been inspected along with the trade permits and all permits are approved.
Records updated	Records are updated in this dataset following request, inspection, and approval.
Records removed or retired	Records are never removed or flagged as retired from this dataset. The Certificate of Occupancy exists for the life of the building unless a use change occurs and another permit application is required. Records are disabled upon demolition of the property.
Reference documentation	See below for an example of Certificates of Occupancy.

Example Certificates of Occupancy

RECORD ID	STREET NBR	STREET DIRECTION	STREET NAME	Zip Code	DESCRIPTION	Current Legal Use	Proposed Use	Cost Contractor	Type Use	Permit Type	Commercial	Residential	Last Approval	DATE STATUS	STATUS
BLD201-8-05314	2820		JOHN R		(AKA UNIT 53 JOHN R) ERECT A 10 UNIT, 3 STORY CARRIAGE HOUSE AS PER CERTIFICATE OF APPROPRIATENESS # 16-4509 AND PLANS.	VACANT LAND	CARRIAGE HOUSE	224000.00	Carrriage House	New	No	Yes	12/16/2021	12/20/2021	CoO Issued
BLD201-8-05318	2826		JOHN R		(AKA UNIT 56) ERECT A 10 UNIT, 3 STORY CARRIAGE HOUSE PER CERTIFICATE OF APPROPRIATENESS #16-4509 AND PLANS. SEE BLD2018-05314 FOR DETAILED PLANS	VACANT	TOWNHOUSE MULTIFAMILY	224000.00	Carrriage House	New	No	Yes	12/20/2021	12/20/2021	CoO Issued
BLD201-8-05319	2828		JOHN R		(AKA UNIT 57) ERECT A 10 UNIT, 3 STORY CARRIAGE HOUSE AS PER CERTIFICATE OF APPROPRIATENESS #16-4509 AND PLANS. SEE BLD2018-05314 FOR DETAILED PLANS	VACANT LAND	CARRIAGE HOUSE	224000.00	Carrriage House	New	No	Yes	12/20/2021	12/20/2021	CoO Issued
BLD202-0-01196	13300		SYRACUSE	48212	Per BZA 67-18, Change of Occupancy to Multi-Family Dwelling (19 Units) per plans. 13291 Mound Legal. Subject To All Applicable Federal, State, and Local Executive Orders.	Multi-Family Dwelling	Multi-Family Dwelling	580000.00		Change of Use	No	Yes	12/21/2021	12/21/2021	Temp CoO Issued
BLD202-0-01548	2037		11TH	48216	Construction of (2) Multi-Family Townhouse Buildings per (SUD184-17) and plans (Subject to all applicable Federal, State and Local Executive Orders.) Note: Parcel combinations and recording of Grant must be provided for issuance of C of O.	Townhouses	Townhouses	1250000.00		New	No	Yes	12/22/2021	12/22/2021	Temp CoO Issued

d. Address Assignments as of 2020 from the City of Detroit Department of Public Works ("DPW");

Use	This dataset is used to maintain a history of address assignments to property and to ensure property is addressed in a logical order. It exists in two separate forms: 1) assignments and 2) ranges.
Creation date	The dataset establishing the address ranging schema was created in the 1921 renumbering program. Certificates assigning addresses have been discovered dating back to 1970.
Storage	The ranges dataset has been maintained since 1921 using a series of paper maps known as the "Address Index." In 2006 the paper maps were scanned and turned into TIF files and stored on the DPW server. In 2019 the scanned images were added as attachments to a GIS layer. The assignment documents were stored in filing cabinets from 1970 to around 2007. In 2019 the assignment documents started being scanned and stored on the DPW server. As of 2022 all assignments are populated in a point feature layer in GIS.
Records added	Assignment data is added to the DPW server as new assignments are generated and added to the point feature layer. New data is triggered when an application for new address assignment is approved, or when discoveries of new addresses are made in the field.
Records updated	See previous.
Records removed or retired	Data is retired when circumstances cause the assigned address to be obsolete. For example, when parcels are combined or buildings are demolished.

e. Water and Sewerage Active Account data from 2020 from the City of Detroit Water and Sewerage Department ("DWSD");

Use	This dataset is used to identify all addresses that are currently or could potentially receive water and/or sewer services.
Creation date	This dataset has been in use since the creation of Detroit Water. It has gone through numerous process improvements over the years from a handwritten to a typed to an electronic dataset. The most recent version is housed in the DWSD Customer Billing System.
Storage	The current electronic version was migrated into the EnQuesta Customer Billing System in 2003 and has been in continuous use since that time. It has gone through several major revisions as the City has updated its parcel classification and/or established demolition programs for abandoned properties.
Records added	New records are added to the dataset as parcel splits and combinations occur. In addition, as properties are subdivided into rentable units, each unit that is a separate rentable unit with differing responsibility also triggers the creation of a new address record.
Records updated	These records are updated on a yearly basis as part of DWSD's evaluation of parcel split and combinations.
Records removed or retired	Records are never removed from the dataset but are flagged as no longer used.
Reference documentation	Below is the split and combination evaluation high level process that occurs on a yearly basis.

Below outlines the process used:

1. Step 1: Check account notes and information in enQuesta. If someone has already updated the mailing address in May 2021 or later, then do not update it again.
2. Confirm if the account is listed as Residential or Non-Residential: this can be verified by accessing the City of Detroit Office of the Assessor (<https://bsaonline.com/Account/LogOn?uid=155>):
 - Once the property classification has been confirmed, if the account is Residential and Water is ON, proceed with updating the mailing address to the property address (housed within Office of the Assessor).
 - For further confirmation IF Water is OFF, enter the address within Google Maps to ensure that a physical home is located there.
 - IF an account is listed as Residential-Vacant: update the mailing address that is shown within the City of Detroit Office of the Assessor.
 - If the property classification is listed as Non-Residential (i.e. Commercial and/or Industrial), update the mailing address shown within the City of Detroit Office of the Assessor.

3. Land-bank: If an account is verified to be owned by the City of Detroit Land-bank, select this option within the Comments field of the report. Ensure to update the mailing address to 500 Griswold St, Suite 1200, Detroit MI, 48226.

- Exception for Active Land-bank (Fast-Track accounts): If an account houses a customer's name and/or a S.S.N. (social security number) or T.I.N. (tax identification number), confirm if the account has active usage (verified within the Usage tab, within enQuesta). Do not proceed with updating the mailing address as outlined above, leave as it is shown within the enQuesta system.

4. City of Detroit owned properties: If an account is verified to be owned by the City of Detroit, select this option within the Comments field of the report. Ensure to update the mailing address to 2 Woodward Ave, Suite 1010, Detroit, MI 48226.

- Exception for Active City of Detroit Accounts: If an account houses a City of Detroit Department (i.e. Parks and Recreation), do not proceed with updating the mailing address as outlined above, leave as it is shown within the enQuesta system.

5. It is imperative that we notate all account mailing address updates that we've performed: be sure to enter work-order number 4018; the case note should mirror the following (i.e. *Updated the account's mailing address, confirmed by either the City of Detroit Office of the Assessor or Google Maps*). In New accounts update name and mailing address both, but in all other accounts update only mailing address.

f. Active Electric and Gas Accounts from April 2020 for the City of Detroit from DTE Energy;

Use	DTE electric and gas service addresses provided to the City of Detroit for the purpose of the 2020 Census
Creation date	April 2020
Storage	This one-time provision of data was incorporated into City of Detroit servers for the City's base address file
Details	<p>Per DTE Energy,</p> <p>Latlong methodology: "The primary source of latitude and longitude for this analysis was the gas 'premise' data that DTE maintains. This is a rooftop location of every gas served address. Where this was not available (either due to a lack of gas service, or a mismatch between the customer record and the premise data) a geocoding service was used. (https://www.geocod.io/)."</p> <p>ZIP code methodology: "The zip codes are an attribute from DTE's customer records. The primary source of data was any gas or electric customer record with 'Detroit' listed as the city. During our data processing we noticed that some addresses that actually lie within the city limit of Detroit were mis-labeled as, for example, Highland Park or Hamtramck. They had therefore been omitted from our initial data extract. As a result, we undertook an additional pull of data based on the affected zip codes, taking care to filter out those addresses that were genuinely not in Detroit."</p> <p>LocationConfidence field methodology: "The LocationConfidence field was intended as a shorthand for differentiating between the different location sources used in the process. Below is a summary. It is only intended to be a relative scale, and does not denote an absolute measure of accuracy. You can use the LocationAccuracyDesc field to see these in the file, although in preparing my response to these questions I noticed that 'Outside Detroit' had been applied to some low location accuracy results in error. Please ignore those values. Only those records with a 'N/A' in the LocationConfidence field are outside of Detroit.</p> <p>High = DTE GIS</p> <p>Medium = Either a Geocode, or a manual address correction from outside of Detroit (the reverse of the problem described in question 1).</p> <p>Low = Low quality geocode (zip centroid etc)</p> <p>N/A = Not applicable. These addresses, while labeled as "Detroit" in the database, do not actually fall within the city limit and have not been attributed to a census tract/block."</p> <p>OccupancyConfidence field methodology: "As above, this field was intended as an easy way to understand the different processes that were used to identify occupied</p>

	<p>premises. The PremiseStatusDesc field details these categories. I have to be a bit less precise here because I can only share the information that is in the MPSC waiver.</p> <p>High = Strong evidence that the site is occupied</p> <p>Medium = Some evidence that it is occupied, but perhaps inconsistent.</p> <p>Low = Our records suggest that the site is unoccupied.”</p>
Reference documentation	Quoted responses provided by Catherine Stafford, Director - Enterprise Data & Analytics at DTE Energy. Description of table provided below.

Column Name	Description
Full_DTE_Address	Street Number and Street Name, City, State, Zip+4
Long	Longitude
Lat	Latitude
Block_GEOID	Census Block GEOID
Block_Name	Census Block Name
Tract_GEOID	Census Tract GEOID
Tract_Name	Census Tract Name
LocationConfidence	Values of High, Medium, and Low
OccupancyConfidence	Values of High, Medium, and Low

g. Affordable Housing Data (available data as of 2019) from the City of Detroit Housing and Revitalization Department (“HRD”);

Use	The Multifamily Excel file is used to monitor affordable housing restrictions in properties with 5 or more units. It is also used to monitor where properties are in the development/construction pipeline. Currently, it is also being used as the baseline file for the City of Detroit’s affordable housing portal for residents, which has not yet launched but will be a user-friendly tool for residents to understand where regulated affordable housing is within the City.
Creation date	The multifamily property Excel file has been in existence since 2018. It recently transferred formats to a more user-friendly database, which will launch this year.
Storage	The multifamily property Excel file was stored on a Box folder internal to HRD. The data has been updated since it was used for the Census Challenge to incorporate new properties and/or update existing property entries. Once the Excel file fully moves to its database form, the data will be stored on internal City of Detroit servers and an HRD-managed Tableau workbook.
Records added	<p>The Multifamily data tracker gets new records through:</p> <ul style="list-style-type: none"> • Direct work with property owners • After City NOFA applications distribute awards and get closings • As MSHDA publishes new affordable housing project recipients around April and October • Requests for LIHTC data directly from Cassandra Brown at MSHDA on a quarterly basis • HUD data will have 3 different datasets downloaded monthly and uploaded to D3 database • City Asset Management reviews: Overall risk rating updated as projects are presented and data is received • P3 Smartsheet: When database is live, downloaded quarterly & uploaded to database based on D3’s database maintenance guide • Costar Data: When database is live, downloaded quarterly & uploaded to database based on D3’s database maintenance guide • City Council approvals: Tracked where preservation projects are on Council agendas, including PED and BFA • DEGC Data: Requested quarterly from David Howell at the Detroit Economic Growth Corporation (DEGC)
Records updated	Records are updated as the above processes are conducted.
Records removed or retired	Records are not typically removed from this database, as public financing information is still useful to monitor and the database serves as our historical record.

Reference documentation	See documentation of data that feeds into the City of Detroit Multifamily Database below.
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Data Process for Multifamily Database

1. **Tracking for preservation & pipeline management:** Manage preservation pipeline and data by tracking status and progress of all existing multifamily projects and updating within existing data sets. This includes the multifamily database file, to be transferred to live database, and the tenant retention plan [tracker](#).
 - a. Manage & input data in multifamily database & tenant retention tracker: Data inputs include but are not limited to:
 - i. Direct work with property owners
 - ii. City NOFA applications, awards and closing
 - iii. LIHTC data:
 1. Track 9% applications awards as MSHDA publishes April & October round information
 2. Request LIHTC data directly from Cassandra Brown at MSHDA quarterly
 - iv. HUD data: When database is live, 3 different datasets downloaded monthly and uploaded to database based on D3's database maintenance guide
 1. HRD Data Dictionary, [Source List & matching tab](#), first three links—could ask Andy if there have been any updates recently
 - v. City Asset Management reviews: Overall risk rating updated as projects are presented and data is received
 - vi. P3 Smartsheet: When database is live, downloaded quarterly & uploaded to database based on D3's database maintenance guide
 - vii. Costar Data: When database is live, downloaded quarterly & uploaded to database based on D3's database maintenance guide
 1. Search for: Detroit MI City Limits
 2. Filter by Multifamily
 3. Download in 3 batches because limit is 500 records:
 - a. 5-20, 21-60, 61+ units
 - b. For each, export the file with the "Multifamily Data" export template selected
 - c. Copy and paste the 3 excel files into 1, then upload into the folder as instructed by D3
 - viii. City Council approvals: Tracked where preservation projects are on Council agendas, including PED and BFA
 - ix. DEGC Data: Requested quarterly from David Howell (reference template originally shared by Nick Marsh)
 - x. For any projects preserved - update:
 1. Preservation Pipeline = TRUE
 2. Preservation bucket = IV or IV
 3. Make sure there are preservation units
 4. Update Year Financing Secured or Contract Renewed, Preservation Mechanism, Preserved Through

h. Addresses Submitted in the Census New Construction Program (Fall 2019) from the City of Detroit Department of Innovation and Technology;

Use	For submission to the 2020 Census New Construction Program
Creation date	Since October 14, 2019
Storage	City of Detroit ArcGIS Online
Reference documentation	2020 New Construction Addresses Page

i. Addresses from the City of Detroit Planning and Development Department compiled for the purpose of participating in the Local Update of Census Addresses Operation (2018);

Use	This is strictly used for 2020 Census (LUCA Title 13)
Creation date	From March 9, 2018 – April 2019
Storage	At the time data was stored in one of the Detroit Department of Innovation and Technology servers. After receiving feedback from the Census Bureau, all LUCA Title 13 material was destroyed per the Census Bureau instructions.
Records added	The new records were added if there were any missing address or unit numbers.
Records updated	We did not do any updates.
Records removed or retired	We compared data against demolition records to remove records.
Reference documentation	We did not archive any materials, as we are not supposed to. Presently we have LUCA Feedback material that we received from the Census Bureau on April 13, 2019. Please see below excerpt.

Excerpt from Census Bureau LUCA Feedback

FORM D-2201
(03/26/2019)
OMB NO. 0607-0994 Approval Expires 12/31/2019

U.S. DEPARTMENT OF COMMERCE
ECONOMICS AND STATISTICS ADMINISTRATION
U.S. CENSUS BUREAU

**2020 CENSUS LOCAL UPDATE OF CENSUS ADDRESSES OPERATION (LUCA)
FEEDBACK ADDRESS UPDATE SUMMARY REPORT**

Entity ID: PL2622000 Entity Name: Detroit city Date: 7/30/2019

A. SUBMITTED ADDRESSES

52732 Total number of address records submitted to the Census Bureau.
52285 Total number of submitted address records processed by the Census Bureau.
447 Total number of submitted address records not processed by the Census Bureau.¹

B. ADDRESS RECORDS PROCESSED**Participant Action(s) Accepted**

23821 Number of added (A) address records submitted and added to the Census Address List.
0 Number of corrected (C) address records submitted and corrected in the Census Address List.
6562 Number of deleted (D) address records submitted and deleted from the Census Address List.
0 Number of out of jurisdiction (J) address records submitted and removed from your jurisdiction's portion of the Census Address List.
0 Number of nonresidential (N) address records submitted and removed from the residential portion of the Census Address List.
30383 Total number of submitted address records accepted by the Census Bureau as requested.

Participant Action(s) Not Accepted

187 Number of added (A) address records submitted, but not added to the Census Address List.
0 Number of corrected (C) address records submitted, but not corrected in the Census Address List.
21715 Number of deleted (D) address records submitted, but not deleted from the Census Address List.
0 Number of out of jurisdiction (J) address records submitted, but not removed from your jurisdiction's portion of the Census Address List.
0 Number of nonresidential (N) address records submitted, but not removed from the residential portion of the Census Address List.
21902 Total number of submitted address records not accepted by the Census Bureau as requested.

C. OTHER ADDRESS RECORDS

540 Number of address records without action taken during the LUCA Review Phase that were deleted from the Census Address List by another LUCA participant or a different census operation. This number corresponds to the number of X01 records on your Detailed Feedback Address List.

¹ Participant address records were not processed if they did not meet the minimum requirements. Some examples of records that were not processed include the following: addresses submitted with blank or invalid action codes, added records submitted without geospatial information, added records submitted with 9-digit numeric MAFIDs, action codes other than "A" used on records without MAFIDs, and non-city style addresses submitted without map spots or latitude and longitude coordinates.

j. 2010 Building Footprint file maintained by the Southeast Michigan Council of Governments ("SEMCOG")

Use	"SEMCOG's building footprints layer was developed as input data to our long range development forecast, specifically to identify the size and geometry of housing units and nonresidential square footage by small area throughout Southeast Michigan."
Creation date	"These were originally developed by using heads-up digitizing to trace the outlines of buildings in 2010 aerial photography. This process was repeated later using 2015 and 2019 imagery. Due to differences in spatial accuracy between the 2010 and later imagery sources, footprint polygons delineated using 2010 aerial photography may appear slightly shifted compared with imagery that is more recent. This dataset is current as of April 2019, and contains only three attributes: the unique building identifier, median height and the source of the footprint polygon."
Storage	SEMCOG Portal
Records added, updated, removed or retired	<p>Last Update: 05/10/2021</p> <p>Versions:</p> <p>Dataset Uploaded 05/10/2021 – Added footprint polygons for 5,851 building points that did not yet have a footprint. All building points now have an associated building footprint. Updated addresses for an additional 30 mobile home parks. Removed 640 buildings permitted but not constructed by April 1, 2020.</p> <p>Dataset Uploaded 01/05/2021 – Added missing buildings between 2,000 and 10,000 square feet in size identified in Nearmap's building outlines layer. Added mobile home units back into the coverage, and updated addresses for 93 mobile home parks.</p> <p>Dataset Uploaded 08/18/2020 – Added missing buildings greater than 10,000 square feet identified in Nearmap's building outlines layer. Updated address and zip code from staff research.</p> <p>Dataset Uploaded 07/08/2020 – Added buildings constructed from 4/1/2015 through 4/1/2020 to the dataset. Updated missing or default square feet and year built from assessing rolls.</p>
Reference documentation	Source: SEMCOG Building Footprints Summary

Appendix B. Comparison and Merging of Review Results and QC Datasets

An R script was written to merge and reconcile all of the tables of reviewed addresses. The datasets were imported and merged into a single data frame. A new boolean column was added to that merged table to track if an address was reviewed and verified as a residential housing unit.

To populate that column, the script started by entering 'TRUE' or 'FALSE' where a determination was made in Sample 4. Then the script looked at each other dataset and entered the determination from that source dataset where the boolean column was null.

The order of precedence of these datasets was:

- the Sample 4 Review
- then the set of addresses related to mixed-use parcels to verify they are residential
- then the set of addresses where inhabitability could not initially be determined
- then Sample 2
- then Sample 1
- then the result from the initial review.

**Testimony Before the United States Senate Committee on Homeland Security and Government
Affairs
Hearing on “Reviewing the 2020 Census: Local Perspectives in Michigan”
July 25, 2022**

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When the 2020 Census population counts came out, I was taken aback. As a demographer and sociologist who conducts ongoing research in Detroit in connection with the Detroit Metro Area Communities Study (DMACS), I regularly track the demographics of Detroit. In news accounts, I had read that Detroit’s 2020 Census count of 639,111 people represented a 10.5% population decline since the 2010 Census. But what puzzled me was a data point that was receiving little media attention: the stark difference between the 2020 Census population count and the Census Bureau’s 2019 population estimate for Detroit. Specifically, the Census Bureau previously estimated the city’s population in 2019 to be 670,031, so the 2020 Census count suggested that Detroit had singularly lost over 30,900 people, or 4.6% of its population, in one year alone. I was skeptical that such a sizable portion of Detroit’s 10-year population decline occurred in such a short time frame. I wondered whether other cities had experienced similar declines between 2019 and 2020, perhaps due to common causes, like the pandemic. I also wondered whether the Census Bureau had devoted adequate time and resources to counting the population of Detroit, where a large share of the population lacks internet access and would not be able to respond to the census online.

Shortly after the Census Bureau released the 2020 data, Mayor Duggan’s office reached out to me and a group of other local demographers and social scientists to ask if we could conduct research that would shed light on the validity of the 2020 Census count.¹ The Mayor, who had already publicly expressed concerns that the 2020 Census had undercounted Detroit, asked us to undertake a study to determine whether there was evidence of such an undercount. My colleagues and I agreed to design such a study under the condition that it would be an independent assessment, and we cautioned that such an investigation could fail to support the Mayor’s impression that the city had been undercounted. The Mayor strongly supported the idea of an independent and scientifically rigorous study of the 2020 Census count.

This research is still ongoing, but the preliminary findings are striking. By way of background, Census data suggest that the precipitous drop Detroit experienced in both its population and housing counts in the 2020 Census is anomalous in comparison to other cities and inconsistent with previous population and housing trends in Detroit. The research we conducted underscores this incongruity. First, in many parts of the City, the 2020 Census failed to count a substantial

number of housing units (whether occupied or vacant), which would correspondingly exclude people living in these housing units from the 2020 Census population count. Our research also found that the 2020 Census undercounted the number of occupied homes in certain parts of the City we examined, thereby underestimating the population count in these areas, as well. A common theme in the undercounted areas we examined was lower levels of self-responding to the census. Areas with lower levels of self-response require more time and staffing devoted to the census Nonresponse Followup (NRFU) operation to ensure an accurate count. Thus, the undercount of people and housing in Detroit appears to be linked to the inadequacy of the 2020 NRFU operation.

Putting Detroit's 2020 Census Count in Perspective

The purported loss of 30,900 people in Detroit in just one year suggested by the 2020 Census is unprecedented in comparison to population changes in Detroit over the prior decade. Figure 1 shows the decennial census counts of Detroit's population in 2010 and 2020 as well as annual Census Bureau population estimates of Detroit's population in the intervening years (extending through 2021).² From 2011 to 2014, the Census Bureau estimates suggest that the city was losing an average of just over 7,000 people annually. In the second half of the decade, Detroit's population loss slowed considerably, with an average annual loss of only 2,500 people from 2015 through 2019. The purported loss of 30,900 people in Detroit from the 2019 population estimate to the 2020 Census count is over three times greater than the largest estimated annual population loss the city had experienced in the previous nine years.³ Notably, the sharp decline in population reflected in the 2020 Census did not continue into 2021, even though many major cities suffered record population losses from 2020 to 2021 due to the pandemic.⁴ According to the Census Bureau's population estimates, Detroit lost slightly fewer than 6,000 people from 2020 to 2021.⁵ If Detroit really had lost over 30,000 people from 2019 to 2020, I would have expected to see a somewhat comparable decline during the following year, but this is not what the data show. In short, the 2020 Census population count for Detroit was anomalous and difficult to reconcile with the city's population trend over the prior decade or its estimated population change from 2020 to 2021.

The 2020 Census count in Detroit was also an outlier compared to population changes in other major U.S. cities. Figure 2 shows the 2020 Census counts for the 50 largest U.S. cities as percentages of the Census Bureau's July 2019 estimates of their population. The only other cities of this size that experienced comparable population declines (i.e., 2020 Census counts that were 4% or more below the Census Bureau's 2019 estimate) were Phoenix, Miami, and San Antonio, all of which have much larger percentages of foreign-born and non-citizen residents. The publicity and controversy surrounding efforts to add a citizenship question to the 2020 Census help explain why these cities may have experienced an undercount,⁶ but such concerns are less likely to explain Detroit's low census count. Moreover, other industrial cities in the Midwest and Northeast did not experience similar population declines between 2019 and 2020, suggesting that

Detroit's population drop was not driven by pandemic-related departures (which would be similar in peer cities).⁷

One factor that may explain why the 2020 Census population count was so low in Detroit compared to other cities is the Census Bureau's shift to self-reporting online. In 2020, the Bureau introduced a new internet-based self-response portal (while still offering opportunities to respond by mail and phone).⁸ Detroit, however, is one of the "least-connected" big cities in the country.⁹ Not surprisingly, Detroit had the lowest self-response rate (51%) to the 2020 Census among the 50 largest cities in the U.S.¹⁰ It is widely recognized that areas with low self-response rates are more difficult to enumerate and more likely to be undercounted.¹¹ This phenomenon plays out in Detroit, as our research reveals that housing units were more likely to be undercounted in census tracts with lower self-response rates.

Focusing on the Housing Count

The Panel to Evaluate the Quality of the 2020 Census at the National Academies of Sciences, Engineering, and Medicine recently observed that "the decennial census is as much an inventory of housing and residential addresses/locations as an enumeration of persons."¹² The decennial census has always been based on addresses and housing unit locations, which are contained in the Master Address File (MAF). The quality and completeness of census data depends on the quality and completeness of the MAF, since every person counted in the census must be tied to a housing unit at a specific address that is recognized in the MAF. Accordingly, our research investigated two pathways through which the 2020 Census may have undercounted housing, and therefore population, in Detroit: (1) erroneous omissions of legitimate housing units from the MAF (by dropping or failing to count) and (2) misclassification of occupied housing units as vacant.

Undercount of Housing Units

In the years leading up to the decennial census, the Census Bureau provides an opportunity for local governments to review and provide feedback on the residential address list for their respective jurisdictions through the Local Update of Census Addresses (LUCA) operation. In 2018, the Census Bureau shared with the City its list of addresses for 367,637 residential housing units in Detroit. The City then reviewed this list and proposed addresses to delete (e.g., because of demolitions, duplicates, or incorrect addresses) and add (e.g., because of new construction or missing units).¹³ After reviewing the City's submission, the Census Bureau returned an updated file (called the "feedback file") and summary of actions taken. That file contained 385,136 addresses, most of which were housing units. However, the 2020 Census showed only 309,913 residential housing units in Detroit, which represents a staggering decline of over 75,000 housing units from the updated address file.

Like the population count, the 2020 Census count of residential housing units was anomalous in comparison to previous trends in Detroit. Figure 3 shows the residential housing counts from the 2010 and 2020 decennial censuses as well as the estimated housing counts for intervening years from the Census Bureau's American Community Survey (ACS). The ACS estimates of residential housing units from 2017 and 2018 are very close to the number of units that the Census Bureau shared with the City in the LUCA Address Count File. By 2019, the ACS estimate had fallen slightly to 359,623 units. But the 2020 Census enumerated only 309,913 residential housing units, suggesting a single year decline of nearly 50,000 housing units, which would constitute a 13.8% drop in its residential housing stock.¹⁴ The decline Detroit experienced in residential housing units counted in the 2020 Census compared to the 2019 ACS is also a large outlier compared to the rest of the 50 largest cities in the U.S., as shown in Figure 4.

The most powerful evidence we have that the 2020 Census undercounted housing units in Detroit comes from an extensive visual audit of housing units on 4,350 census blocks where the City filed a request to the Census Bureau for a review of the residential housing unit count as part of its Count Question Resolution (CQR) program.¹⁵ The CQR program allows local governments to request a review of census housing counts "to determine whether census processing error(s) excluded valid housing and associated population data."¹⁶

As part of our audit study, a team of 106 "raters" reviewed images from Google Maps Street View and/or Detroit Street View of 114,274 specific addresses listed on the blocks submitted for review in the CQR program.¹⁷ The raters reviewed two images for each residential address -- one that was closest in time before April 1, 2020,¹⁸ and another that was closest in time after April 1, 2020 -- to determine whether there was a housing structure at the site that met the Census Bureau's definition of a residential housing unit.¹⁹ Our audit study also included a quality control process in which a sample of addresses was rated by a second rater, who was also provided with a site license to access a database of aerial images that was not publicly available.²⁰ Moreover, all cases in which the initial rater could not determine whether a given housing structure met the Census Bureau's criteria for being considered a residential housing unit were assigned to a second rater who had access to the aerial imagery.

Our audit validated that the 2020 Census had undercounted the number of housing units on 69.7% of the census blocks we reviewed (i.e., 2,990 of the 4,350 blocks that the City submitted for review as part of the CQR).²¹ The magnitude of this housing undercount was substantial. Across these 2,990 blocks, we counted a total of 78,887 residential housing units compared to only 69,553 in the 2020 Census, meaning the census missed 11.8% of the residential housing units on these blocks. These results suggest that the Census Bureau omitted a substantial number of residential housing units from the MAF. Crucially, anyone living in a housing unit that was not listed on the MAF could not be included in the 2020 Census population count.

I conducted further analysis of our audit data to understand what features of blocks may have contributed to the undercount of residential housing units in Detroit. The factor that emerged as the strongest predictor of the housing undercount was the census self-response rate. Figure 5 illustrates how the census undercount of housing units (measured at the block level) is associated with the 2020 Census self-response rate (measured at the tract level). The block-level housing undercount was over 3.5 times higher in tracts with self-response rates of less than 25% compared to those with self-response rates 75% or more.

This finding is important because places with lower self-response rates require more nonresponse followup (NRFU) field work, making these areas more difficult to enumerate, which can lead to more errors in coverage (when persons or housing units are either missing from the census count or appear in the wrong place).²² Although we already knew from previous research, including the Census Bureau's Postenumeration Survey,²³ that omissions of people from the census count are more common in tracts with lower self-response rates, our analysis shows that omissions of housing units are also more common in such areas. These problems can be exacerbated if not enough time and resources are devoted to the NRFU operation in places with low self-response rates. As Mayor Duggan explains in his testimony (and the attached signed statements from 11 census enumerators further support), the NRFU operation in Detroit started late, ended prematurely, and was not adequately staffed or supervised.

Undercount of Occupied Housing Units

The housing audit described above provides evidence that the 2020 Census undercounted the total number of residential housing units, regardless of whether they were occupied or vacant. Our team also conducted research showing that the 2020 Census understated the number of *occupied* housing units in a sample of Detroit neighborhoods that we analyzed in a report released in December 2021.²⁴ In this study, we examined 2020 Census counts of occupied housing in two sets of neighborhoods, each consisting of five census block groups. The first set of block groups should have been relatively easy to count because they had higher rates of self-response (the average tract-level self-response rate was 66.7%), relatively high rates of residential stability, and a preponderance of single-unit, owner-occupied housing, and yet the 2020 Census produced anomalously low counts of occupied housing. The second set of block groups was selected to represent areas that should have been harder to count because they had lower self-response rates (the average was 32.4%), lower rates of residential stability, and higher vacancy rates.

Our study compared the 2020 Census count of occupied housing units in each block group to data from two independent sources: (a) the United States Postal Service (USPS) Delivery Sequence File from June 2020 and (b) a canvass of all residential housing units in the first sample of block groups (conducted by Wayne State University), in which canvassers counted

occupied units through inspection, and, when necessary, conversations with potential occupants.²⁵

The upshot is that we documented a substantial undercount of occupied housing units in all 10 block groups and obtained very similar results when comparing the 2020 Census data to either the USPS data or data from our canvass. The undercount of occupied housing units was more pronounced in the second sample of block groups, where self-response rates were lower.²⁶ In comparing the USPS data to the census data across all 10 block groups, we estimated that the census had undercounted the population in these areas by 8.1%. Although we do not know for certain the extent to which these are generalizable to the rest of the city, if undercounts of a similar magnitude are found in a majority of the city's more than 600 block groups, the ultimate size of a population undercount could be in the tens of thousands.

Additional Insights from the Census Bureau's 2020 Post-Enumeration Survey

In thinking about how large the 2020 Census undercount may have been throughout Detroit, it is useful to consider some of the findings from the Census Bureau's 2020 Post-Enumeration Survey (PES). Because the Census Bureau does not share results from the PES for specific cities or local jurisdictions below the state level, the national results provide our best indication of which demographic and geographic subgroups were undercounted in the 2020 Census.

The PES results show that the 2020 Census missed 3.3% of the nation's Black population.²⁷ According to the 2020 Census, more than three-quarters (77.2%) of Detroit's population is Black/African American. Although the Census Bureau has not provided PES estimates below the state level, it is reasonable to conclude that the census missed a similarly high percentage of Detroit's Black residents.

The PES also documented an undercount of renters of nearly 1.5%, while homeowners were overcounted. Over half of the households in Detroit are renters, well above the national average of about a third of households. Again, this means a higher proportion of Detroit households were at risk of being missed.

Finally, the PES revealed "significant net undercounts" in the 20 percent of census tracts in the nation with the lowest self-response rates. Detroit's self-response rate at the start of the Nonresponse Follow-up (NRFU) operation was 48.7 percent. An additional 2.3 percent of households self-responded during NRFU, for a final self-response rate of 51 percent (as of 10/28/20), which was below the 2010 Census self-response rate (53.6%) and well below the national self-response rate (67%). Unfortunately, a large swath of Detroit's neighborhoods fell into the bottom 20 percent of census tracts with the lowest self-response rates nationwide.

Ideas for Improving Census Accuracy Moving Forward

The decennial census is a massive and complex operation that serves as the backbone for national statistics in the United States. Among its many functions, it determines how congressional seats are apportioned to states, where the boundaries of legislative, school and voting precincts are drawn, and how more than \$1 trillion in federal funding is allocated.²⁸ It also informs the annual population estimates that the Census Bureau issues between the decennial years.

Although I have been critical of the 2020 Census for undercounting Detroit's population and residential housing stock, I also want to acknowledge the severe and unprecedented operational challenges that the Census Bureau faced in implementing the 2020 Census and commend the Bureau for its heroic efforts in adapting to extremely difficult circumstances and completing its work. The COVID-19 pandemic presented problems for the Nonresponse Followup (NRFU) operation, requiring the Bureau to balance its operational demands with concerns for public health, including the health of its staff. The Bureau also confronted challenges preceding the implementation of the census, including underfunding that led to cutting key pre-census tests and programs, and the proposed addition of a question on citizenship, which created a climate of distrust that likely lowered self-response rates.²⁹ Moreover, when the pandemic delayed the onset of field operations, the Census Bureau tried to extend the census deadlines for field data collection and data delivery, but Congress did not act on this request, leading to extensive litigation and ultimately a decision by the U.S. Supreme Court to extend the deadline for field operations to October 15, 2020.³⁰ This chaotic process stoked concerns that the census was being inappropriately rushed.³¹

But, as the recent interim report from the Panel to Evaluate the Quality of the 2020 Census at the National Academies of Sciences, Engineering, and Medicine concludes, "The fact that the 2020 Census was completed under difficult circumstances is not the same, and is not meant to be interpreted, as a broader statement that the 2020 Census and its data products are high quality and credible."³²

What stands out to me from my experience in working with the City of Detroit to investigate and challenge its 2020 Census undercount is the lack of transparency in how the Census Bureau develops its Master Address File (MAF) during the operation of the census and the implications this has for counting housing and population. The address list is the foundation of the census enumeration and it is critical that local governments be able to review, validate, and correct this information, especially since it forms the basis for federal and state decisions that significantly impact these communities.

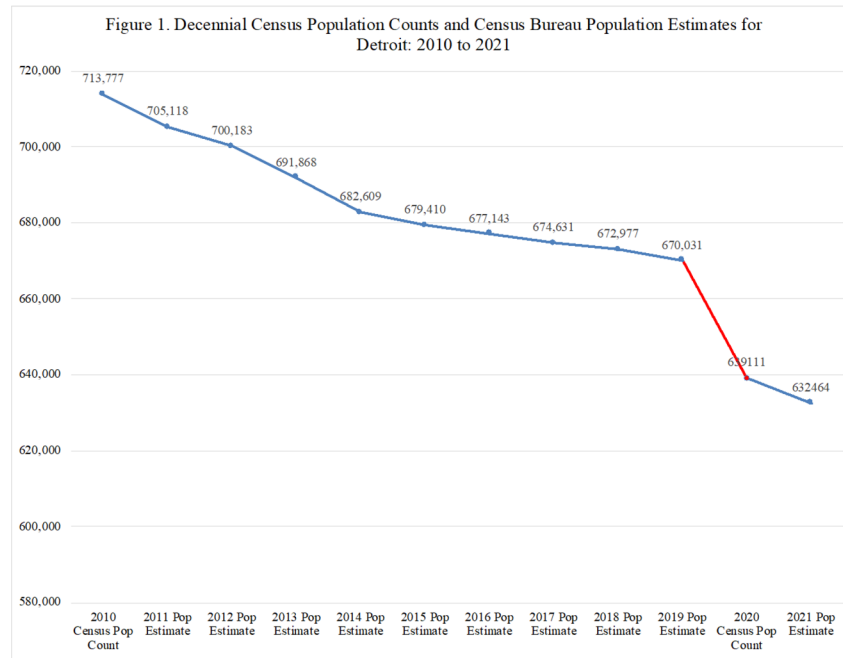
In reflecting on their unsuccessful challenge of the 2010 Census count in New York City under the Count Question Resolution Program, Salvo and Lobo explained how, despite improvements

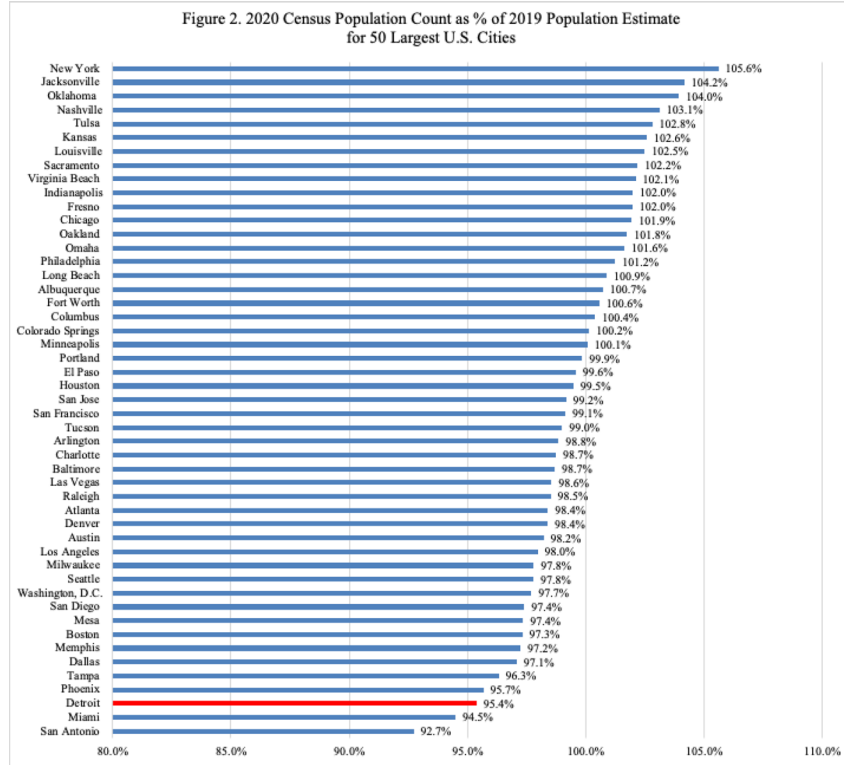
that Census Bureau has made in the way it maintains and develops the MAF, it is common for errors to occur due to “incomplete or incorrect addresses, questions about the very existence of housing units and/or confusion over whether a building even qualifies as an inhabitable structure.”³³ Such problems “can undermine the integrity of the MAF, and by extension, the enumeration.”³⁴

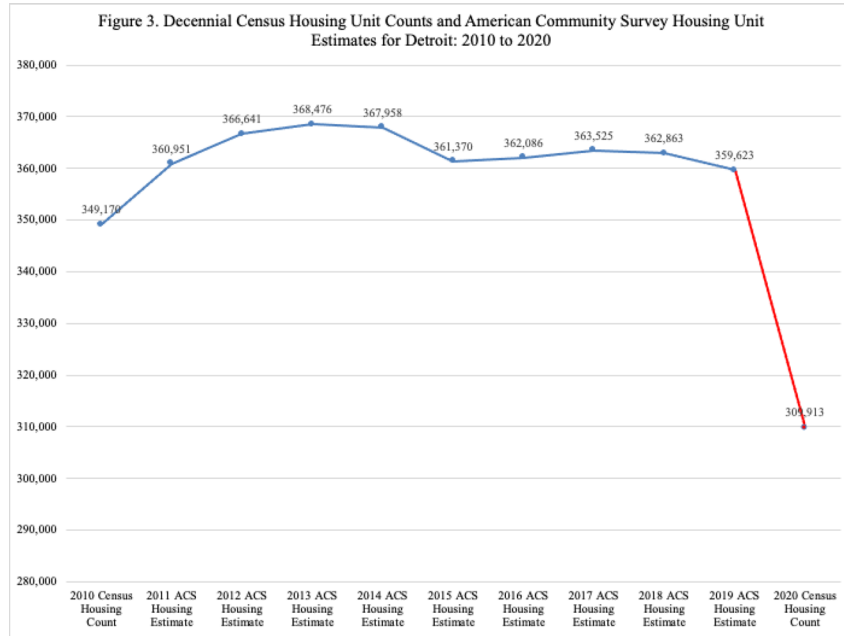
Since the passage of The Census Address List Improvement Act of 1994 (Public Law 103-430), the Census Bureau has made great efforts to work with local governments to improve the way it develops and maintains the MAF. This law created the Local Update of Census Addresses (LUCA) program, which gave local governments the opportunity to examine the list of all addresses in their jurisdiction before the decennial census enumeration, allowing them to suggest adding, deleting, or changing addresses in the MAF.

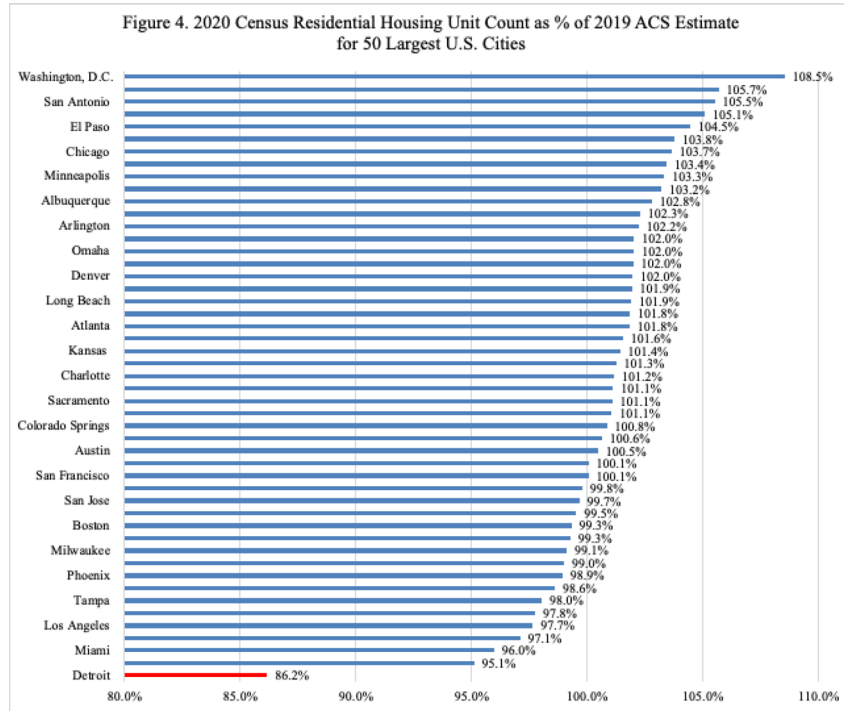
But, LUCA provides only a brief window of opportunity for local governments to work with the Census Bureau in developing the MAF, and this window closes once the enumeration process begins. In its efforts to challenge and correct the count of residential housing units, the City of Detroit is not permitted to view which addresses are included in the MAF or learn which addresses were dropped from the MAF since the LUCA process ended and the enumeration period began. Allowing local governments continual access to specific information about which housing units are accounted for in the MAF before, during, and after the census enumeration period would substantially improve the quality of the census enumeration and minimize the risk of undercounts like the one Detroit experienced in the 2020 Census. I join Salvo and Lobo in advocating for “a continuous address list operation conducted throughout the decade, aimed at incorporating incremental improvements, based on a frequent dialog with local entities.”³⁵ Such an expansion of LUCA would be “the next logical step in the process that began when LUCA first opened the door to substantive address input from local governments.”

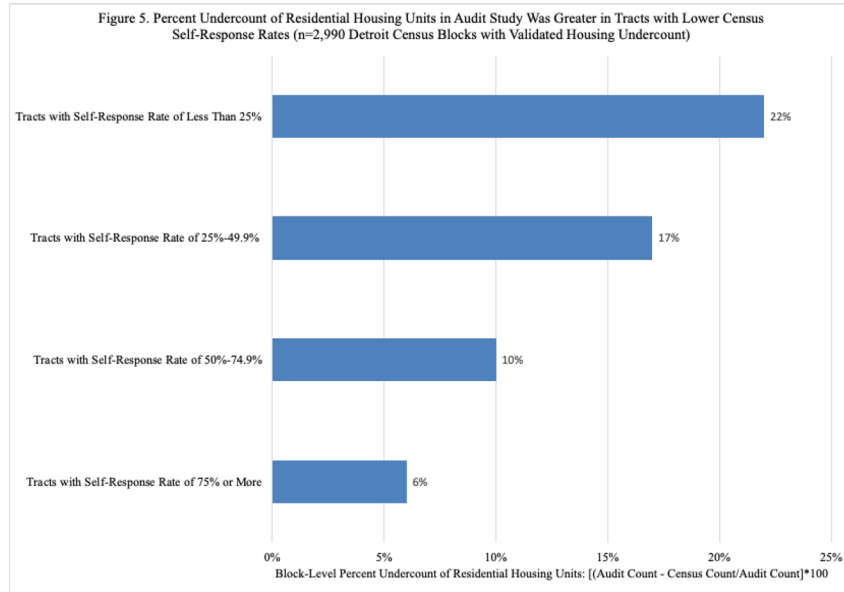
FIGURES











ENDNOTES

¹ This group of social scientists also included Reynolds Farley, Lisa Neidert, Patrick Cooney, Luke Schaefer, and Elisabeth Gerber from the University of Michigan; Ramona Rodríguez-Washington from the Center for Urban Studies at Wayne State University; and Kurt Metzger, the founder and director emeritus of Data Driven Detroit.

² Each year the Census Bureau releases an official estimate of the residential population of every municipality in the nation. These annual population estimates are based on the previous decennial census count, the number of recorded births and deaths in the prior year, and information about in and out migration. Though the annual population figures are estimates, they are generally quite accurate—indeed, federal funds are distributed to states and localities based on these annual estimates.

³ Census Bureau population estimates from July 1, 2014 and July 1, 2015 show that Detroit lost an estimated 9,259 people, making it Detroit's largest annual population decline of the decade aside from the change between its 2019 population estimate and the 2020 Census count.

⁴ Frey, William H. (2022, July 11). "Report: Big cities saw historic population losses while suburban growth declined during the pandemic." Brookings: Washington, D.C. Available at: <https://www.brookings.edu/research/big-cities-saw-historic-population-losses-while-suburban-growth-declined-during-the-pandemic/>

⁵ The difference between the Census Bureau's estimated population for Detroit on July 1, 2020 and July 1, 2021 is 5,712 people. To be clear, the Census Bureau's July 1, 2020 population estimate for Detroit (638,176) is slightly different from the April 1, 2020 population count in the 2020 Census (639,111).

⁶ Wang, Hansi Lo (2019, June 4). "2020 Census Could Lead To Worst Undercount of Black, Latinx People In 30 Years." National Public Radio: Washington, D.C. Available at: <https://www.npr.org/2019/06/04/728034176/2020-census-couldlead-to-worst-undercount-of-black-latinx-people-in-30-years>

⁷ For more comparisons between Detroit and other industrial cities, see Cooney, Patrick, Ren Farley, Samiul Jubaed, Kurt Metzger, Jeffrey Morenoff, Lisa Neidert, and Ramona Rodríguez-Washington (2021, December). "Analysis of the Census 2020 Count in Detroit." Poverty Solutions, University of Michigan. Available at: <http://sites.fordschool.umich.edu/poverty2021/files/2021/12/PovertySolutions-Census-Undercount-in-Detroit-PolicyBrief-December2021.pdf>

⁸ O'Hare, William P. and Jae June J. Lee (2021, April). "Who Responded in the 2020 Census? Variation in Tract-Level Self-Response Rates in the 2020 U.S. Census." Washington, D.C.: Georgetown Center on Poverty and Inequality.

⁹ "Worst Connected Cities 2019," *National Digital Inclusion Alliance*. Available at: <https://www.digitalinclusion.org/worst-connectedcities-2019/>

¹⁰ Khan, Nisa (2020, October 19). "Michigan at 8th place for 2020 Census self-response, but Detroit last for large cities," *Detroit Free Press*. Available at: <https://www.freep.com/story/news/local/michigan/2020/10/19/michigan-detroit-2020-censusresponse/3710170001/>

¹¹ See O'Hare, William P (2020). "Are Self-Participation Rates Predictive of Accuracy in the U.S. Census?" *International Journal of Social Science Studies* 8. See also 2020 Census Quality Indicators Task Force (2020, October). *2020 Census Quality Indicators: A Report from the American Statistical Association*. Alexandria, VA: American Statistical Association.

¹² National Academies of Sciences, Engineering, and Medicine. (2022). *Understanding the Quality of the 2020 Census: Interim Report*. Washington, DC: The National Academies Press.

¹³ During the LUCA process, the Census Bureau actually added more addresses to the MAF after considering the City's proposed additions and deletions. The Bureau accepted 23,821 of the City's 24,008 proposed additions to the MAF but only accepted 6,562 of the City's 21,715 proposed deletions from the MAF. By the end of the LUCA process, the MAF contained 385,676 addresses, including addresses of both residential housing units and group quarters.

¹⁴ Detroit has experienced many housing demolitions in recent years, but these were accounted for in the LUCA operation so that the MAF would not erroneously maintain records of housing at addresses where structures had been demolished. The City tracks records of completed residential demolitions on its Open Data Portal: <https://data.detroitmi.gov/datasets/detroitmi::completed-residential-demolitions/about>. In 2019 and 2020 combined, there were 4,802 demolitions in Detroit, which does not account for the dramatic decline in housing units between the 2019 ACS estimate and the 2020 Census count of residential housing.

¹⁵ The City submitted a list of 4,350 blocks to the Census Bureau on which its internal data showed that the number of residential housing units exceeded the housing unit count from the 2020 Census. The City's table of all Detroit addresses was compiled from the United States Postal Service Delivery Point Validation file and the City's Completed Residential Demolitions data. The City also linked all addresses in its internal data to its building footprint data.

¹⁶ United States Census Bureau (2021, December 1) "2020 Census Count Question Resolution Operation (CQR)." Washington, D.C. Available at: <https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/evaluate/cqr.html>.

¹⁷ For more details on the methodology of this audit, see the City of Detroit's June 30, 2022 Supplemental CQR submission, attached to Mayor Duggan's testimony as Exhibit 2.

¹⁸ The census counts where each person was living as of April 1, 2022.

¹⁹ All raters underwent extensive training to ensure they had a uniform understanding of the Census Bureau's definition of residential housing units. The Bureau's definition of residential housing units includes all occupied housing units and vacant housing units that are "intended for occupancy." One of the main criteria that vacant housing units must meet to be counted is that they cannot be "exposed to the elements" (i.e., the roof, walls, windows, and doors must protect the interior of the structure from the elements). For more detail on the census definition of housing units, see the Census Bureau's "Definitions" document on its Housing Vacancies and Homeownership (CPS/HVS) website: <https://www.census.gov/housing/hvs/definitions.pdf>.

²⁰ When the street view images were inconclusive, our quality control team viewed 360-degree oblique aerial images of properties from April, 2020 that were maintained by the Detroit Office of the Assessor. Also, addresses corresponding to parcels that were coded by the Office of the Assessor as "Mixed-Use" were visited in person by researchers from Wayne State University to assess whether they contained residential housing units.

²¹ The City's supplemental CQR submission requests that the Census Bureau focus its review of the residential housing count on the 78,887 addresses contained on these 2,990 blocks.

²² O'Hare, William P. (2020). "Are Self-Participation Rates Predictive of Accuracy in the U.S. Census?" *International Journal of Social Science Studies* 8.

²³ Hill, Courtney, Krista Heim, Jinhee Hong, and Nam Phan (2022, June). "2020 Census Coverage Estimates for People in the United States by State and Census Operations." Washington, D.C. Available at: <https://www2.census.gov/programs-surveys/decennial/coverage-measurement/pes/census-coverage-estimates-for-people-in-the-united-states-by-state-and-census-operations.pdf>

²⁴ Cooney, Patrick, Ren Farley, Samiul Jubaed, Kurt Metzger, Jeffrey Morenoff, Lisa Neidert, and Ramona Rodriguez-Washington (2021, December). "Analysis of the Census 2020 Count in Detroit." Poverty Solutions, University of Michigan. Available at: <http://sites.fordschool.umich.edu/poverty2021/files/2021/12/PovertySolutions-Census-Undercount-in-Detroit-PolicyBrief-December2021.pdf>

²⁵ We sent a team of canvassers to visit all census blocks in these five block groups to count the total number of housing units and determine the occupancy/vacancy status of each housing unit. Canvassers were trained to determine the occupancy status of a housing unit based on physical characteristics of the structure (e.g., car in the driveway, lights on in the home), and, when occupancy status was ambiguous, talk to possible occupants of the housing units and/or neighbors. One issue with comparing data on housing occupancy from the 2021 canvass to the 2020 Census is that housing conditions may have changed in the elapsed time between the Census enumeration and the canvass. To address this limitation, we also analyzed data from the United States Postal Service (USPS) Delivery Sequence File from June 2020, counting only addresses that were verified to be occupied. Whereas the canvass was only conducted on the first set of five block groups, we analyzed USPS data on all 10 block groups.

²⁶ In the first sample of block groups (with higher self-response rates), we documented a 7.6% undercount of occupied housing units, while in the second sample of block groups (with lower self-response rates), we documented a 9.2% undercount.

²⁷ Hill, Courtney, Krista Heim, Jinhee Hong, and Nam Phan. (2022, June). *2020 Post-Enumeration Survey Estimation Report*. U.S. Census Bureau: Washington, D.C. Available at: <https://www2.census.gov/programs-surveys/decennial/coverage-measurement/pes/census-coverage-estimates-for-people-in-the-united-states-by-state-and-census-operations.pdf>

²⁸ O'Hare, William P., Cara Brumfield, and Jae June J. Lee. (2020). "Evaluating the Accuracy of the Decennial Census: A Primer on the Fundamentals of Census Accuracy and Coverage Evaluation." Georgetown Center on Poverty and Inequality. Available at <https://www.georgetownpoverty.org/issues/evaluating-the-accuracy-of-the-decennial-census/>.

²⁹ National Academies of Sciences, Engineering, and Medicine. (2022). *Understanding the Quality of the 2020 Census: Interim Report*. Washington, DC: The National Academies Press.

³⁰ Ibid.

³¹ Ibid.

³² Ibid.

³³ Salvo, Joseph J. and Arun Peter Lobo. (2013). "Misclassifying New York's Hidden Units as Vacant in 2010: Lessons Gleaned for the 2020 Census." *Population Research and Policy Review* 32: 729-751.

³⁴ Ibid.

³⁵ Ibid.



ANALYSIS OF THE CENSUS 2020 COUNT IN DETROIT

DECEMBER 2021

By Patrick Cooney, Ren Farley, Samiul Jubaid, Kurt Metzger, Jeffrey Morenoff, Lisa Neidert, and Ramona Rodriguez-Washington¹

KEY FINDINGS

- Our data suggest the 2020 Census undercounted the number of occupied residential units in 10 Detroit Census block groups we analyzed by 8.1%.
- Detroit is an outlier compared to other U.S. cities in the extent to which its 2020 Census population and housing counts deviate from the Census Bureau's 2019 population and housing estimates.
- Data from our analysis of Census block groups and peer cities offer compelling evidence of a likely undercount of Detroit in the 2020 Census.
- Decennial population counts and annual population estimates are critically important, used to determine the allocation of hundreds of billions of dollars in federal funding to state and local governments.

EXECUTIVE SUMMARY

Each year the Census Bureau releases an official estimate of the residential population of every municipality in the nation. The Census Bureau estimated that in 2019, Detroit had a population of roughly 670,000. However, just one year later, the 2020 Census counted only 639,000 residents living in the city, a decline of roughly 31,000 residents from its 2019 estimate. In the context of the Census Bureau's previous enumerations and estimates of Detroit's population, a single-year decline of 31,000 residents is anomalous and implausible.² With such a dramatic discrepancy between the 2019 estimates and the 2020 count, it is possible that the Census Bureau either significantly overestimated Detroit's population in the years preceding 2020 or significantly undercounted the city's population in 2020.

In this report, we lay out preliminary evidence supporting the latter case, suggesting the Census Bureau undercounted Detroit's population in 2020. We present the results of an analysis of 10 block groups in Detroit, comparing the Census Bureau's count of occupied housing units in those block groups with counts from United States Postal Service data from June 2020, when the Census was taking place.³ For five of these block groups, we also present data from a canvass conducted by Wayne State University (WSU) in September and October 2021 that provides data on the overall number of housing units and the number of occupied housing units in those block groups.

Our analysis suggests the 2020 Census produced an undercount of occupied housing units in the 10 sampled block groups, including one set of five block groups with relatively high rates of residential stability and another set of five block groups with higher vacancy rates and lower rates of self-response in the 2020 Census (we refer to these block groups as "less stable").⁴ In the set of more residentially stable block groups we sampled, depending on the data source we use, the 2020 Census appears to have produced an undercount of between 223 and 277 occupied units, counting between 7.6% and 9.5% fewer occupied units.⁵ In the five less residentially stable block groups we analyzed, the 2020 Census appears to have produced an undercount of 161 units, or roughly 9% fewer units. In sum, after conducting an audit of the Census counts of residential units and occupied units in a selection of both more stable and less stable Detroit block groups, we find that the 2020 Census appears to have undercounted the number of occupied residential units across these 10 block groups by 8.1%, missing an estimated 964 Detroit residents. If undercounts of a similar magnitude occurred in a majority of the city's more than 600 block groups, the potential undercount could be in the tens of thousands.

In addition to this block group level analysis, we also analyzed other data produced by the Census Bureau, which show

Detroit as an outlier compared to other U.S. cities in the size of the discrepancy between the Census Bureau's 2019 population estimates and its 2020 population count. Given the circumstances of the 2020 Census count in Detroit (e.g., high reliance on internet self-response and abbreviated Non-Response Follow Up (NRFU) period combined with the city's hard-to-count characteristics) these data offer compelling evidence of a likely undercount of Detroit in the 2020 Census.

PRELIMINARY EVIDENCE OF AN UNDERCOUNT IN DETROIT: AN ANALYSIS OF 10 DETROIT BLOCK GROUPS

To better understand whether and to what extent there was an undercount in Detroit in the 2020 Census, the City of Detroit commissioned WSU to conduct a canvass of five Census block groups in which the vacancy rate reported in the 2020 Census was far higher than one would expect based on vacancy estimates from the 2015-2019 American Community Survey (ACS).⁶ Researchers from the University of Michigan, in collaboration with city staff, selected a set of five block groups where the counts of occupied housing in the 2020 Census were substantially lower than (a) counts of housing units with active DTE Energy (a Detroit utility provider) accounts and (b) estimated counts of occupied housing units from the 2015-2019 ACS. These five block groups also had relatively high rates of residential stability and homeownership based on 2015-2019 ACS. In short, this set of five block groups was selected to represent areas of the city where it should have been relatively easy to produce accurate population counts—because they have high rates of residential stability and a preponderance of single-family, owner-occupied homes (2015-2019 ACS)—and yet

the 2020 Census produced anomalously low rates of occupied housing. If the 2020 Census inaccurately classified a substantial number of occupied housing units in these areas as vacant, this would translate into a substantial undercount of the population.

The WSU team canvassed these five block groups to count the total number of housing units and determine the occupancy/vacancy status of each housing unit. Canvassers were trained to determine the occupancy status of a housing unit based on physical characteristics of the structure (e.g., car in the driveway, lights on in the home), and, when occupancy status was ambiguous, talk to possible occupants of the housing units and/or neighbors.

One issue with comparing data on housing occupancy from the 2021 WSU canvass to the 2020 Census is that housing conditions may have changed in the elapsed time between the Census enumeration and the canvass. To address this limitation, we drew upon a third data source—the United States Postal Service (USPS) Delivery Sequence File from June 2020—that also provides counts of occupied housing in the sampled block groups from a time period that is contemporaneous with the 2020 Census.⁷

RESULTS IN STABLE BLOCK GROUPS

Figure 1 below shows the occupancy rate for each of the five residentially stable block groups we inspected, by data source. Across all five block groups,⁸ occupancy rates as measured by the WSU canvass and USPS data are between 6.2% and 15% higher than occupancy rates measured by the Census, with a high degree of similarity in the rates obtained by the two non-Census sources.⁹

FIGURE 1: ESTIMATED OCCUPANCY RATES IN SELECT STABLE BLOCK GROUPS

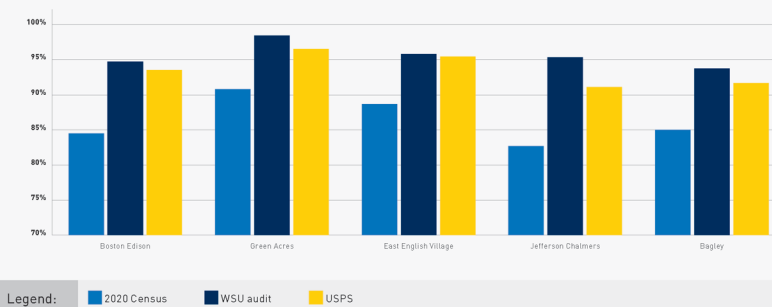


TABLE 1: COUNT OF OCCUPIED HOUSING UNITS IN SELECT STABLE BLOCK GROUPS BY SOURCE OF COUNT

NEIGHBORHOOD/ BLOCK GROUP	2020 CENSUS	WSU CANVASS	USPS	DIFFERENCE (WSU - CENSUS)	% UNDERCOUNT (WSU)	DIFFERENCE (USPS - CENSUS)	% UNDERCOUNT (USPS)
Boston Edison	399	484	478	85	17.6%	79	16.5%
Green Acres	474	500	490	26	5.2%	16	3.3%
East English Village	911	969	965	58	6.0%	54	5.6%
Jefferson Chalmers	459	522	499	63	12.1%	40	8.0%
Bagley	486	531	520	45	8.5%	34	6.5%
TOTAL	2729	3006	2952	277	9.2%	223	7.6%

In Table 1, we show these counts by block group and source of count. In each block group, the USPS and WSU data suggest an apparent Census undercount of between 16 and 85 occupied units. In total, the WSU data suggest a Census undercount of 277 occupied units across these five block groups (9.2% fewer occupied units), and the USPS data suggest an undercount of 223 occupied units (7.6% fewer occupied units).¹⁰

RESULTS IN LESS RESIDENTIALLY STABLE BLOCK GROUPS

In addition to analyzing the count of residential units and occupied residential units in residentially stable block groups, we also conducted an analysis of occupied residential units in five block groups with high vacancy rates and low rates of self-response on the 2020 Census. If the first set of block groups should have been easy to count, this second set of block groups were chosen to understand the potential for an undercount in block groups where it may have been harder to achieve an accurate count.¹¹ Our suspicion was that we were likely to see a larger undercount in these less residentially stable neighborhoods, given their hard-to-count features. For this second set of block groups we do not have WSU canvassing data, so rely only on USPS data.

Given the reliance on internet self-response in the 2020 Census (discussed below), and the ways in which the count may be vulnerable to inaccuracies in areas with low self-response rates, we chose five block groups to analyze based on the following criteria: (a) the Census tract in which the block group is nested had a self-response rate below 40%;¹² (b) the Census 2020 count of housing units was within +/- 10% of the count of housing units based on City of Detroit Property Assessment data, to reduce the likelihood of analyzing a block group with many large multifamily properties;¹³ and (c) the number of active DTE energy accounts was larger than the number of occupied units counted by the Census Bureau, again to reduce the likelihood of analyzing a block group with a

large number of multifamily properties.¹⁴ This set of five block groups also had a much higher vacancy rate (average rate of 38.5%) in the 2020 Census than the initial set of five block groups we selected (average rate of 13.7%).

For these five block groups we can only produce a count of occupied residential units, not a count of total residential units. This is because the USPS data only yields reliable counts of occupied units and is less reliable in counting uninhabitable housing units.¹⁵

Still, given that our main focus is the count of occupied housing units in each block group, the USPS data from June 2020 offer a helpful comparison to the 2020 Census figures. The results of our analysis are summarized in Table 2 below.

TABLE 2: COUNT OF OCCUPIED HOUSING UNITS IN SELECT LESS STABLE BLOCK GROUPS

NEIGHBORHOOD/ BLOCK GROUP	2020 CENSUS	USPS	DIFFERENCE (USPS - CENSUS)	% UNDER-COUNT
Dexter-Linwood	333	365	32	8.8%
Franklin	344	352	8	2.3%
LaSalle-College Park	462	510	48	9.4%
Islandview	238	274	36	13.1%
Virginia Park	239	276	37	13.4%
TOTAL	1616	1777	161	9.1%

Our initial hypothesis was that if there was a potential Census undercount, it would be greater in these less residentially stable block groups than in the more stable block groups analyzed above. This hypothesis is borne out by the data, which show that the Census counted 9.1% fewer occupied units than USPS in these block groups, a slightly greater undercount than we found among the more residentially stable block groups (see Table 1), where USPS data suggested that 7.6% of occupied units in those areas were not counted by the 2020 Census.

A potential undercount of this magnitude is not trivial. We used the results from the audit study to project how many people may have been undercounted in the sampled block groups based on the discrepancy between the USPS data and 2020 Census in their counts of occupied housing units. The results are shown in Table 3. We created an estimate of residents living in the ten block groups according to USPS data (column 5) by multiplying the number of estimated occupied units (column 4) by the number of people per occupied housing unit in the sampled block groups (column 3). We express the projected undercount in terms of the number of people we expect were not counted (column 6) and the percentage of the population (as estimated by USPS data) of the sampled block groups who were not counted (column 7). Aggregating across all 10 sampled block groups, we project the Census undercounted these areas by 964 people, equivalent to 8.14% of the estimated population of these areas. The projected undercount was slightly higher in 5 block groups with lower levels of residential stability (9.1% of the estimated population) compared to those with higher levels of residential stability (7.6% of the estimated population). While we can't say for certain the extent to which results from these block groups are generalizable to the rest of the city, if undercounts of a similar magnitude are found in a majority of the city's more than 600 block groups, the ultimate size of a potential undercount could be in the tens of thousands.

These block group audits offer compelling evidence of a likely undercount in Detroit, particularly when paired with additional data on the size of the discrepancy between the Census Bureau's 2019 population estimate and 2020 count, and the

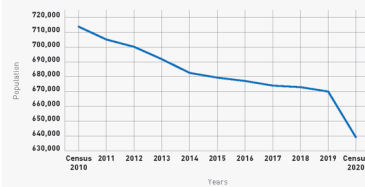
unique circumstances of the 2020 Census. We review this additional data in the following pages.

THE DISCREPANCY BETWEEN THE 2019 ESTIMATE AND 2020 COUNT OF POPULATION AND HOUSING

Each year the Census Bureau releases an official estimate of the residential population of every municipality in the nation. Though the annual population figures are estimates, they are generally quite accurate—indeed, federal funds are distributed to states and localities based on these annual estimates.¹⁶ Therefore, we would expect the trend line in annual population estimates to align fairly well with the decennial Census count.

However, as noted above, Detroit's 2020 count diverges significantly from prior estimates. Figure 2 shows that Detroit's population was estimated to have declined each year since the 2010 Census, but the rate of that decline slowed substantially since 2016. The Census Bureau estimated an average annual population decline of 0.9% between 2011 and 2016, and just 0.4% between 2016 and 2019. The decline from 2019 to 2020—a nearly 5% drop in the city's population—is out of line with recent trends, as well as with the discrepancies we see in 2019 estimates and 2020 counts in other U.S. cities.

FIGURE 2: CENSUS BUREAU COUNTS AND ESTIMATES OF DETROIT'S POPULATION 2010 TO 2020



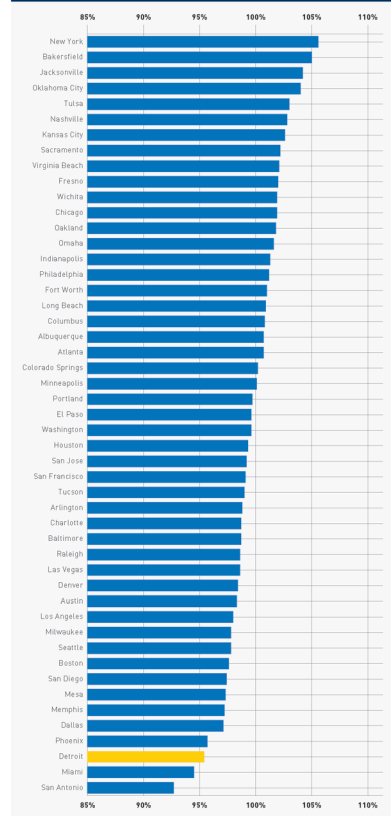
Source: U.S. Census Bureau

TABLE 3: ESTIMATED POPULATION UNDERCOUNT IN 10 DETROIT BLOCK GROUPS

SAMPLE OF BLOCK GROUPS	(1) # PEOPLE: 2020 CENSUS	(2) # OCCUPIED UNITS: 2020 CENSUS	(3) PEOPLE PER OCCUPIED UNIT: 2020 CENSUS	(4) # OCCUPIED UNITS: USPS	(5) # PEOPLE: USPS	(6) PROJECTED POPULATION UNDERCOUNT	(7) PROJECTED UNDERCOUNT (POPULATION) AS A PERCENTAGE OF USPS ESTIMATE
5 block groups with high residential stability	6685	2729	2.4	2952	7231	566	7.6%
5 block groups with low residential stability	4197	1616	2.6	1777	4615	418	9.1%
TOTAL	10882	4345	2.5	4729	11846	964	8.1%

In Figure 3 we show the 2020 Census count for the 50 largest U.S. cities as a percent of the Census Bureau's July 2019 estimate of their population.

FIGURE 3: A COMPARISON OF THE 2020 CENSUS COUNT AND 2019 POPULATION ESTIMATES FOR LARGEST 50 U.S. CITIES



5 Source: U.S. Census Bureau

Phoenix, Detroit, Miami, and San Antonio are distinguished from the other 46 large cities, with counts that came in 4% or more below the Census Bureau's 2019 estimate. Of these cities, however, Detroit is the only one that does not have a large foreign-born or non-citizen population (see Table 4). There was great controversy over the efforts to add a citizenship question to Census 2020. Given the attention on this issue, it is reasonable to expect that undocumented persons and citizens living in households with undocumented relatives would be reluctant to respond to Census 2020, leading to a potential undercount in these cities.¹⁷ But this does not help to explain the undercount in Detroit, which has far fewer people who are foreign born or non-U.S. citizens than these other cities.

TABLE 4: % FOREIGN BORN AND % NOT U.S. CITIZEN IN HIGH-DISCREPANCY CITIES

CITY	% FOREIGN BORN	% NOT U.S. CITIZEN
Miami	58.4%	28.4%
Phoenix	20.1%	12.4%
San Antonio	14.1%	8.7%
Detroit	6.1%	3.5%

Source: ACS 2019 1-year estimates

Perhaps unsurprisingly given the population figures, we also see a large discrepancy between the Census Bureau's 2019 estimate and 2020 count of housing units in Detroit. In 2010, the Census counted 349,000 housing units in Detroit. To prepare for the decennial enumeration, the Census Bureau develops a Master Address File (MAF), compiled using USPS data and commercial mailing lists. Roughly three years before the enumeration, the Census Bureau shares information with local governments in their Local Update Census Address Operation (LUCA), and local governments may challenge or update the MAF developed by the Census Bureau. In 2018, officials from the Detroit Planning Department provided the Census Bureau with an address file showing roughly 368,000 residential units—occupied or vacant—in the city.

The American Community Survey provides estimates of housing units for each municipality of 65,000 or more residents on an annual basis. The City of Detroit's estimate of 368,000 residential units is very close to the Census Bureau's estimate of 364,000 residential units from the 2017 ACS. By

2019, the Census estimate had fallen slightly, to 359,000 units. But 2020 Census enumerated only 310,000, suggesting a single year decline of nearly 50,000 housing units.

DETROIT'S POPULATION AND HOUSING COUNTS COMPARED TO INDUSTRIAL CITIES IN THE MIDWEST AND NORTHEAST

In addition to comparing Detroit to other large cities, we also narrowed our focus to compare the discrepancy between Detroit's 2019 estimates and 2020 counts with other industrial cities in the Midwest and Northeast, some of which, like Detroit, have also experienced population decline over the past 50 years. Perhaps the discrepancy we see in Detroit is also present in these other peer cities.

Here too, however, Detroit is an outlier. Table 5 shows the Census 2020 population and housing counts and the 2019 estimates in Detroit and other peer cities, including high poverty cities with large shares of Black residents, such as Cleveland and St. Louis.¹⁹ The difference between Detroit's 2020 count and 2019 estimate, at 4.6%, is more than twice the gap of the next closest city, Cleveland (2.2%). The housing discrepancy is even greater, with Detroit's nearly 14% gap more than three times Cleveland's gap of 4.3%.

In any given Census, certain populations—including people of color, immigrants, children, and low-income households—are harder to count, for a variety of reasons.²⁰ However, other cities that share certain hard-to-count characteristics with Detroit—such as high rates of poverty or large shares of residents of color—did not experience the same discrepancy between 2019 estimate and 2020 count we see in Detroit. Rather, Detroit's circumstances appear unique.

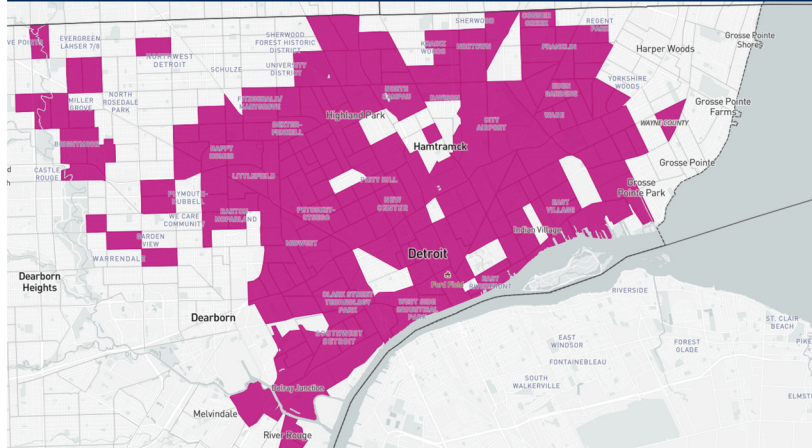
THE SPECIFIC CHALLENGES OF TAKING A CENSUS IN DETROIT IN 2020

Adding to the difficulties of obtaining an accurate count in Detroit in 2020, the 2020 Census for the first time placed significant reliance on households self-reporting information through the internet.²⁰ The reliance on internet-based self-reporting was likely to present a particularly large obstacle in Detroit, one of the "least-connected" big cities in the country.²¹ The map below (Figure 4) shows all the tracts in Detroit in which the self-response rate on the 2020 Census was in the bottom 20% of all Census tracts nationally. As one can see, much of the city falls into this bottom fifth. Indeed, Detroit had the lowest self-response rate among all cities with at least 500,000 residents.²²

TABLE 5: POPULATION AND HOUSING 2020 COUNTS AND 2019 ESTIMATES IN DETROIT AND INDUSTRIAL CITIES

CITY	POPULATION 2020	HOUSING 2020	POPULATION 2019	HOUSING 2019	POPULATION 2020/ POPULATION 2019	HOUSING 2020/ HOUSING 2019
Detroit	639,111	309,913	670,052	359,623	0.954	0.862
Cleveland	372,624	198,871	380,989	207,813	0.978	0.957
St. Louis	301,578	173,479	300,576	177,400	1.003	0.978
Milwaukee	577,222	257,723	590,157	260,024	0.978	0.991
Boston	675,647	301,702	694,295	303,791	0.973	0.993
Pittsburgh	302,971	157,695	300,281	158,561	1.009	0.995
Baltimore	585,708	293,249	593,490	293,877	0.987	0.998
Cincinnati	309,317	158,773	303,954	158,394	1.018	1.002
Kansas City	508,090	241,949	495,278	238,547	1.026	1.014
Columbus	905,748	415,456	902,073	402,520	1.004	1.032
Minneapolis	429,954	199,143	429,605	192,708	1.001	1.033

6 Source: U.S. Census Bureau

FIGURE 4: DETROIT CENSUS TRACTS IN THE BOTTOM 20% OF TRACTS NATIONALLY IN RATE OF SELF-RESPONSE


Source: www.censushardtocountmaps2020.us

When a household fails to self-report, the Census tries to ascertain information about the household through a Non-Response Follow Up (NRFU) process. The Census Bureau first seeks to ascertain occupancy/vacancy status of a residence through high-quality administrative records. Residential units deemed vacant are supposed to receive a home visit from a Census enumerator to confirm vacancy, while most of those deemed occupied are supposed to receive a number of visits, with the goal of making contact with a household member, or, after a certain number of visits, a proxy (e.g. neighbor, landlord, etc.). If an enumerator is still unable to make contact with a member of the household, the Census Bureau may try to return to administrative records to enumerate the household, or rely on a count imputation procedure.²³ In 2020, the Census Bureau relied to a significant degree on the use of administrative records, both in a bid to reduce costs as well as out of necessity, as traditional enumeration activities began late and were cut short by the Trump administration.²⁴ Though many experts note that increased reliance on administrative records has the potential to improve accuracy and reduce costs, others find that administrative records are prone to inaccuracies, particularly for traditionally hard to count populations.²⁵

The low rate of self-response in Detroit means that the Census Bureau had to enumerate a large share of Detroit's population through the NRFU process. It is possible this impacted the accuracy of the count in Detroit, given the unprecedented reliance on administrative records and truncation of traditional NRFU activities. In short, in a year in which the Census was particularly reliant on internet self-response, and the NRFU process was abbreviated, the city's hard-to-count features may have been heightened.²⁶

CONCLUSION

Every year, hundreds of billions of dollars flow to state and local governments based on decennial Census counts and annual estimates. Attaining an accurate count is therefore critically important. This report lays out compelling evidence of a likely undercount in Detroit in the 2020 Census. After reviewing data on the extent to which Detroit was an outlier in the discrepancy between its 2019 population estimate and 2020 count, we engaged in a block group-level analysis to learn more. The magnitude of the potential undercount in these block groups, when combined with the other data we've accumulated here, provide sufficient evidence to warrant further investigation, both by researchers and government officials, to ensure the city's count is accurate.

APPENDIX

DIFFERENTIAL PRIVACY ANALYSIS

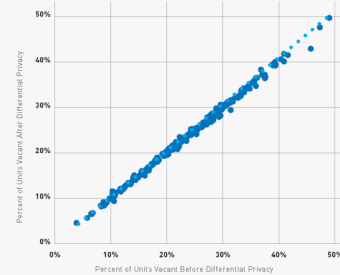
In an effort to protect the identities of Census takers, the Census Bureau deployed a technique known as differential privacy in the 2020 Census, in which random noise is inserted in the data.⁷⁷ While this may enhance privacy protections, it can also make the data imprecise at small geographies.⁷⁸ If the low Census occupancy counts in our chosen neighborhoods were the result not of an undercount but of the differential privacy procedure, then conducting an audit of those counts would be useless, as the counts would be incorrect on purpose.

To understand the impact the differential privacy procedure might have on vacancy rates at small geographies, we applied the differential privacy procedure to Detroit's 2010 Census counts at the census tract and block group levels. If the vacancy rate in a given tract or block group as reported in the 2010 Census was similar to the vacancy rate in that tract or block group after differential privacy was applied, we can assume that differential privacy does not impact the accuracy of the count of occupied and vacant units.

In the two figures below, the x-axis shows the vacancy rate of a given geography in the 2010 Census before differential privacy is applied, and the y-axis shows the vacancy rate after differential privacy is applied. Figure 1 shows this comparison at the census tract level, and Figure 2 shows it at the block group level.

At the Census tract level, differential privacy has virtually no impact on vacancy rates. At the block group level the data are a bit noisier, but the impact of differential privacy still appears to be minimal, with an average difference between pre- and post-differential privacy vacancy rates of plus or minus 2.6 percentage points. Therefore, while it's possible that the count of total and occupied units in a block group would be impacted by differential privacy and yield an artificially incorrect count, we can be reasonably confident that for most block groups in Detroit, the counts reported by the Census Bureau are quite close to the actual Census counts. This also means that if we see discrepancies in the vacancy rates between the WSU/USPS counts and the Census count, we can be reasonably confident that these represent evidence of a potential miscount in the 2020 Census in these neighborhoods, particularly if the discrepancies are large.

FIGURE 1: THE EFFECT OF DIFFERENTIAL PRIVACY AT THE CENSUS TRACT LEVEL



Source: David Van Riper, Tracy Kugler, and Jonathan Schroeder. IPUMS NHGIS Privacy-Protected 2010 Census Demonstration Data, version 20210608 [Database]. Minneapolis, MN: IPUMS. 2020.

FIGURE 2: THE EFFECT OF DIFFERENTIAL PRIVACY AT THE BLOCK GROUP LEVEL



Source: David Van Riper, Tracy Kugler, and Jonathan Schroeder. IPUMS NHGIS Privacy-Protected 2010 Census Demonstration Data, version 20210608 [Database]. Minneapolis, MN: IPUMS. 2020.

ENDNOTES

- 1 Patrick Cooney is the assistant director of policy impact at the University of Michigan's Poverty Solutions initiative; Ren Farley is a research scientist at the Population Studies Center, the Dudley Duncan Professor Emeritus of Sociology, and a lecturer at the Ford School of Public Policy, all at the University of Michigan; Samiul Jubeed is a data and policy analyst at Poverty Solutions at the University of Michigan; Kurt Metzger is the founder and director emeritus of Data Driven Detroit; Jeffrey Morenoff is a Professor in the Department of Sociology, Professor at the Ford School of Public Policy, and Research Professor in the Population Studies Center and Survey Research Center, all at the University of Michigan; Lisa Naidert is a lecturer in the Department of Sociology at the University of Michigan; Ramona Rodriguez-Washington is a program director at the Center for Urban Studies at Wayne State University.
- 2 According to previous enumerations and estimates, Detroit lost an average of roughly 8,000 residents each year from 2010 to 2014, and just 2,000 residents each year from 2014 to 2019.
- 3 A "block group" is a geography defined by the Census, consisting of a collection of Census blocks. Throughout, we will sometimes refer to the block groups we analyzed as "neighborhoods," though the geographic boundaries of the units under analysis remain the same.
- 4 U-M researchers and City officials identified five stable neighborhoods where the 2020 Census produced higher than expected vacancy rates. These more residentially stable neighborhoods were characterized by high rates of homeownership, relatively high median income, and low vacancy rates in previous Census estimates. U-M researchers also identified five less residentially stable neighborhoods to audit, prioritizing neighborhoods with low self-response rates on the 2020 Census, a proxy for a number of other measures of disadvantage. Block groups chosen for analysis also had a small discrepancy in total residential units as counted by the Census and by the City of Detroit assessor's office, and a count of active utility accounts larger than the Census count of occupied units, both to reduce the likelihood of our selecting a block group with a large number of multifamily properties.
- 5 The WSU canvassing figures showed a larger Census undercount, hence the range of estimates.
- 6 One limitation of analyzing block-group-level counts of vacant and occupied housing units in the 2020 Census is the Census Bureau intentionally added noise to these counts in an attempt to reduce the risk of disclosing the identity of individuals and households, through a process called differential privacy. To understand the impact the differential privacy procedure might have on vacancy rates at small geographies, we applied the differential privacy procedure to Detroit's 2010 Census counts at the Census tract and block group levels and found it had very little impact on this measure at these geographies, giving us more confidence in the block group audits. See the appendix for more details on our analysis of the impact of differential privacy on estimates of vacancy rates.
- 7 As an additional check on the accuracy of the USPS data, for some selection of addresses which were marked as occupied in the USPS data and vacant in the WSU data—or vice versa—we looked at Google Street View images of the property from a pre-Census and post-Census time period. For the properties we analyzed, the USPS data appear accurate. For example, the Google Street View image of a property marked vacant in the WSU data and occupied in the USPS data might show a property that in June 2019 had a maintained yard and people on the porch, but in an August 2021 image, the property appears boarded up. In addition, staff from Detroit's Land Bank Authority (DLBA) have conducted analyses comparing USPS occupancy data with neighborhood-level surveys, and found the USPS data set to be the most accurate administrative data for determining the occupancy/vacancy status of one- to four-family residential units.
- 8 The specific "stable" neighborhoods we chose to canvass were: tract 5321 block group 1 (Boston Edison); tract 5381 block group 1 (Green Acres); tract 5018 block group 1 (East English Village); tract 5133 block group 2 (Jefferson Chalmers); tract 5386 block group 4 (Bagley).
- 9 Because we used the USPS data as a check on the WSU data, the denominator for total residential housing units in the USPS occupancy rate calculation comes from the WSU data set.
- 10 Throughout the report, we calculate the percent difference between Census and non-Census data by using the non-Census estimate as the base figure.
- 11 The specific "less stable" neighborhoods analyzed were: tract 5315.02 block group 1 (Dexter-Linwood); tract 5034 block group 1 (Franklin); tract 5054 block group 2 (LaSalle-College Park); tract 5193 block group 1 (Islandview); and tract 5327 block group 1 (Virginia Park).
- 12 Self-response rates are reported at the tract level, so we chose block groups that were inside of tracts with low self-response rates.
- 13 The City parcel data codes all apartment buildings with the same code and a single entry, so if there were many more units counted in a block group by the Census Bureau than is shown in the parcel data, it could be that the Census Bureau is counting many apartments that don't show up in the parcel data. We wanted to analyze block groups with relatively few apartment buildings because City staff informed us that USPS occupancy data is most accurate for single-family homes up to four-unit buildings.
- 14 In some block groups, the number of occupied units reported by the 2020 Census is much larger than the number of active DTE accounts because a single DTE hookup may be reported for a large apartment building, for example.
- 15 While the USPS data appropriately marks some vacant lots as neither occupied nor vacant, in other instances the vacant code is applied to vacant lots, yielding this code insufficient to help us understand the total number of habitable units in a geography.
- 16 Nora Gordon and Krista O'Connell, "Why Does the Census Matter for State and Local Governments?" *Georgetown University McCourt School of Public Policy*, February 18, 2020. Available at: <https://mccourt.georgetown.edu/news/why-does-the-census-matter-for-state-and-local-governments/>
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- 18 In a 2019 report by the Urban Institute, which included among its authors the new director of the Census Bureau, Robert Santos, researchers estimated that the 2020 Census—after taking into account traditional hard-to-count characteristics as well as the unique circumstances of the 2020 Census described below—could undercount Black residents in the U.S. by as much as 3.68%. Report available at: https://www.urban.org/research/publication/assessing-miscounts-2020-census/view/full_report
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- 26 Robert Santos, "Risk Factors Assessing the Fairness and Accuracy of the 2020 Census," *Urban Institute*, December 3, 2020. Available at: <https://www.urban.org/sites/default/files/publication/103306/risk-factors-affecting-the-fairness-and-accuracy-of-the-2020-census-rob-santos.pdf>
- 27 Ron Jarmin, "Redistricting Data: What to Expect and When," *United States Census Bureau*, July 28, 2021. Available at: <https://www.census.gov/newsroom/blogs/director/2021/07/redistricting-data.html>
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**Testimony of N. Charles Anderson
President & Chief Executive Officer
Urban League of Detroit & Southeastern Michigan**

**U.S. Senate Committee on Homeland Security and Government Affairs
Field Hearing on “Reviewing The 2020 Census: Local Perspectives in Michigan”**

**Detroit, Michigan
July 25, 2022**

Chairman Peters, thank you for this opportunity to testify today on *Reviewing the 2020 Census: Local Perspectives in Michigan*. Specifically, thank you for bringing the focus of the Census home to Michigan, which unfortunately and regrettably lost a Congressional seat following the 2020 Census. I do want to also thank Mayor Mike Duggan for advocating for a complete count of Detroit and formally challenging our Census Bureau's 2020 numbers. I am honored to be part of this witness panel of outstanding leaders, experts, and community organizers who continually strive to make the state of Michigan and the city of Detroit an international metropolis that serves the need of all of its residents.

As noted, I am N. Charles Anderson, and I have the privilege of serving as the President & Chief Executive Officer of the Urban League of Detroit & Southeastern Michigan. Our organization is a long-time member of the Michigan and Detroit community, having been founded in 1916, over 106 years ago. In my role, my most important job is serving the community and working on behalf of the citizens of Detroit, especially those in marginalized communities, to offer the resources, support, and representation they deserve in partnership with many organizations with the same intent and purpose.

The Urban League of Detroit & Southeastern Michigan is one of the 92 affiliates of the National Urban League across 36 states and the District of Columbia. The Urban League movement serves almost 2 million people *per year* and enables and empowers African Americans and others in underserved communities to achieve their highest human potential and secure economic self-reliance, parity, power, and civil rights. I'm proud to say that the Detroit Urban League is serving more than 13,000 citizens each month, more than 125,000 annually here in Southeastern Michigan.

As part of our mission, the National Urban League convened the 2020 Census Black Roundtable with over 20 national civil rights organizations to organize and strategize ahead of the many obstacles that threaten an accurate count of Black people in this country and, in turn, the essential resources they need.

Over the years, in past annual Censuses, it has been a real privilege to partner with the U.S. government to conduct the Census. The 2020 Census effort did not feel like a truly friendly effort. The Urban League movement absolutely applauds the U.S. Census Bureau's rank and file career staff in the Chicago region, under the leadership of Regional Director, Marilyn Saunders, for their efforts at completing the census in Michigan, especially under unheralded political interference and a global pandemic that is still wreaking havoc on the lives of many, including in

the city of Detroit. The Chicago Regional Office and the Census Bureau as a whole were still able to carry out the constitutional mandate requiring a national count of the U.S. population once every decade. State-level data does not indicate a statistically significant overcount or undercount for the state of Michigan.¹

In coalition with our partners, the Urban League of Detroit and Southeast Michigan was able to join in with other national, state and local support to create infrastructure including public-private partnerships that included numerous volunteers and organizations, and a vast communication apparatus to ensure the fair and accurate count of Detroiters leading up to the official counting. There were over 100 organizations statewide that met regularly to prepare ahead of the Census Campaign because we understood how detrimental the financial impact would be for another undercount in our beloved city.

For example, we engaged with the Detroit Regional Chamber to encourage business operators and customers. Additionally, we worked with countless organizations like the Michigan Nonprofit Association, businesses, and community organization such as grocery stores, utility offices, faith-based community centers, drug stores, and movie theaters to have over 30 Census kiosks in seven districts across the city where residents could easily complete the Census in 5-10 minutes as they went about their daily business and activities.

Considering that Detroit has a disproportionate number of communities that are often hard to reach (i.e., people without internet access, low-income households, people with disabilities, people of color, undocumented immigrants, people who don't speak English and members of the LGBT community, homeless and housing insecure people and families), we secured hundreds of Detroit-based Census workers, volunteers, and nonprofit organizations who knew their neighborhoods and would be trusted by their community, especially in the midst of a global pandemic. Over 100 events were held to get people to sign up to support the Census count.

We cannot overstate the manpower that was required to reach every dwelling in every section of the city, especially during a time when the Detroit Office went from having five local census offices to one and the regional office was relocated from Detroit to Chicago. The Detroit 2020 Census Campaign had over 12 community groups canvass in Detroit areas of low response (they knocked on over 300,000 doors in the city).²

We called on all available resources, with some extra focus on the use of social media. We worked with a variety of media outlets from the Michigan Chronicle, Bridge Magazine, Detroit Free Press and Detroit News, as well as other language media organizations to counter the misinformation and disinformation about the confidentiality of the Census data and it being shared with government agencies and law enforcement.

¹ D'Vera Cohn & Jeffrey S. Passel, *Key Facts About the Quality of the 2020 Census* (Jun. 8, 2022), <https://www.pewresearch.org/fact-tank/2022/06/08/key-facts-about-the-quality-of-the-2020-census/>.

² Zholdas Orisbayev, *Census Faces Challenges in Michigan, Particularly in the North* (Oct. 2, 2020, 7:26 pm), <https://www.lansingcitypulse.com/stories/census-faces-challenges-in-michigan-particularly-in-the-north,15036>.

In addition, we incorporated social media kits that included campaigns with trusted sources encouraging the completion of the Census. Victoria Kovari, who Mayor Duggan appointed as Detroit 2020 Census Campaign's executive director, reported that almost \$1 million was spent to place ads in social, digital and traditional media to promote the importance of the census to communities. This was significantly more than the amount spent in the last decennial count.

Even with these unprecedented efforts, there were still significant undercounts of the Black community and other marginalized communities in Detroit. The Census acknowledges the undercounts for Black and Hispanic populations, and American Indian populations residing on reservations. The 2020 Census Black undercount of 3.3 percent exceeded the previous 2010 Black undercount of 2.06 percent.^{3 4}

The Urban League of Detroit & Southeastern Michigan and the National Urban League have grave concerns about the City of Detroit's undercount. More substate data on undercounted communities are needed from the Census Bureau to help local elected officials identify with precision which communities have the greatest need. The Census Bureau's provision of state-level undercount data only hinders the ability of service providers, like the Urban League and our local elected officials and community partners, to allocate sparse resources to significantly undercounted households and families who are hurting the most from structural inequities exacerbated by COVID-19.

While we don't have data on the undercount, and we understand the Census Bureau does not intend to release data at the substate level at this time, many of the groups historically undercounted are similar to the groups in Detroit, such as a large Black population, immigrant population, young children, incarcerated individuals, those in multiple-family dwellings, and those with limited broadband access. More than 75% of the Detroit population is Black, with a growing immigrant population, and our community is diverse in the country of birth, language, and socioeconomic characteristics.^{5 6}

While Detroit is celebrated as an international, diverse, and vibrant mecca, it is sadly a tale of two cities with the haves and have nots, which was made more visible by COVID-19. In a Brookings report, authors found that "in Detroit, Black people represent over 75 percent of known COVID-19 diagnoses by race and nearly 90 percent of deaths."⁷

³ *Census Bureau Releases Estimates of Undercount and Overcount in the 2020 Census* (Mar. 10, 2022), <https://www.census.gov/newsroom/press-releases/2022/2020-census-estimates-of-undercount-and-overcount.html>.

⁴ Mike Schneider, *WATCH: U.S. Census Bureau Releases Undercount of Minority Groups in 2020 Census* (Mar. 10, 2022, 10:13 am), <https://www.pbs.org/newshour/politics/watch-live-u-s-census-bureau-releases-undercount-data-from-2020-census>.

⁵ Valerie Lacarte, *Black Immigrants in the United States Face Hurdles, but Outcomes Vary by City*, MIGRATION POL'Y INST. (Feb. 10, 2022), <https://www.migrationpolicy.org/article/black-immigrants-united-states-hurdles-outcomes-top-cities>.

⁶ Migration Pol'y Inst., *Data Hub, State Immigration Data Profiles, MI*, <https://www.migrationpolicy.org/data/state-profiles/state/demographics/MI>.

⁷ Rashawn Ray et al., *Examining and Addressing COVID-19 Racial Disparities in Detroit*, BROOKINGS INST. (Mar. 2, 2021), https://www.brookings.edu/wp-content/uploads/2021/02/Detroit_Covid_report_final.pdf.

⁸ These racial disparities in COVID-19 impacts are not surprising given the long-standing racial inequities in health care, education inequities from preschool through postsecondary, high unemployment rates of Black people, especially males, poverty rates, housing and food insecurity and continuing incarceration of young Black men. These disparities are only further perpetuated by an undercount of these populations.

For example, the undercount has a disastrous impact on young children, who are vastly undercounted in the Census even after concentrating on counting this often-forgotten group.⁹ Over 50% of children in Detroit live in poverty and receive free lunch and childcare subsidies while dealing with potentially lifelong health challenges, including being born with low birth weight, tested for lead, and hospitalized for asthma.¹⁰ These rates are significantly higher in Detroit than in the rest of the state. These disparities contribute to the opportunity gap that we must close to ensure that *all* children can reach their potential regardless of race, place, and class.¹¹

This undercount also has severe economic consequences affecting Black and Brown households in Detroit, Michigan, and nationwide. The National Urban League has called for a congressional hearing in Washington, DC, so that the public and elected leaders can understand the implications of the 2020 Census undercount nationwide--especially federal funding shortfalls.

Given the post-COVID economic needs of our community and the anticipated loss of federal funding over the next 10 years until the 2030 Census, Detroit is slated to lose billions of dollars that could be used to rebuild our infrastructure, housing, schools, healthcare, and address other societal and economic needs. Since the last decade, Detroit has been on a much need path of revitalization and regrowth. A poor census count directly undermines our growth and economic security – setting our progress back, especially for those from marginalized communities.

As Mayor Duggans has previously stated following the University of Michigan's extensive research on Detroit's 2020 Census undercount¹² last year, the projected *8 percent* undercount of Detroit's population following the 2020 Census creates "disastrous financial consequences" for the city. Due to the Census undercount, the Urban League of Detroit & Southeastern Michigan and other local nonprofit service providers will need to address these shortfalls with increased services and programming.

⁸ Rashawn Ray et al., *Examining and Addressing COVID-19 Racial Disparities in Detroit*, BROOKINGS INST. (Mar. 2, 2021), https://www.brookings.edu/wp-content/uploads/2021/02/Detroit_Covid_report_final.pdf.

⁹ William P. O'Hare, *The Undercount of Young Black Children in the U.S. Census*, COUNT ALL KIDS (Mar. 2020), <https://countallkids.org/resources/the-undercount-of-young-black-children-in-the-u-s-census/>.

¹⁰ Michigan League For Pub. Pol'y, *2020 Kids Count in Michigan Data Profiles, Kids Count, Archive*, <https://mlpp.org/2020kidscount/detroit.pdf> (last visited Jul. 11, 2022).

¹¹ Dolores Acevedo-Garcia et al., *The Child Opportunity Gap: Inequities in Child Opportunity Within Metros*, BRANDEIS UNIV., HELLER SCH. FOR SOC. POL'Y AND MGMT. (Dec. 17, 2019), <https://www.diversitydatakids.org/research-library/data-visualization/child-opportunity-gap>.

¹² Patrick Cooney et al., *Analysis of the Census 2020 Count in Detroit*, UNIV. OF MICHIGAN, GERALD R. FORD SCH. OF PUB. POL'Y, POVERTY SOLUTIONS (Dec. 2021), <https://sites.fordschool.umich.edu/poverty2021/files/2021/12/PovertySolutions-Census-Undercount-in-Detroit-PolicyBrief-December2021.pdf>.

The Black community, in particular, must shoulder the burden of an undercount for the next 10 years, which it has been doing since 1790, when we were counted as three-fifths of a person.¹³ The Urban League will and must continue to fight for accurate data, including a corrected Census to address anticipated funding shortfalls and gaps.

Beyond the inequitable distribution of over \$1.5T in federal funding over the next 10 years, there are political consequences of an undercount. Detroit and the State of Michigan have already felt the political repercussions of a Census undercount through the loss of a congressional seat in the U.S. House of Representatives. Statewide, we are waiting to see how Detroit is going to be impacted with how state senate and house seats are going to fall out.

The Urban League urges the Census Bureau to identify opportunities to correct the numbers to reflect an accurate count of our community so that federal funding needs are addressed. Moreover, we urge the Census Bureau to extend broad flexibility in reviewing local challenges to the 2020 Census count, including the acceptance of alternative local data previously not eligible for "challenge" consideration such as, local utility hook-ups and school enrollment numbers.

Finally, the Detroit & Southeastern Michigan Urban League also has concerns with prison gerrymandering. Michigan has an incarceration rate of 599 per 100,000 people (including prisons, jails, immigration detention, and juvenile justice facilities). Our country locks up a higher percentage of its population than almost any democracy on earth. This prison industrial complex is felt especially hard by the Black community, who make up 14% of the state population for over 50% of those imprisoned.^{14 15} One in 68 Black people are imprisoned in Michigan, and arguably many are from the Detroit metro region.

Given that many prisons are built in rural, primarily white communities, it is concerning when Black people, especially Black men, are not counted in their home district, reducing the political representation of an already marginalized community. The Urban League of Detroit & Southeastern Michigan takes this opportunity to encourage Michigan legislators to pass legislation that abolishes prison gerrymandering, similar to Illinois and other states (California, Colorado, Connecticut, Delaware, Maryland, Nevada, New Jersey, New York, Virginia, and Washington State) that correct their Census data by creating special state-level censuses that collect the home addresses of people in prison and then adjust the U.S. Census counts prior to redistricting.¹⁶

¹³ Nat'l Urb. League, *Historic Census Undercount of Black Americans Robs Communities of Billions in Funding and Fair Political Representation* (Jul. 6, 2022), <https://nul.org/news/historic-census-undercount-of-black-americans-robs-communities>.

¹⁴ Prison Policy Initiative, *Racial and Ethnic Disparities in Prisons and Jails in Michigan*, <https://www.prisonpolicy.org/profiles/MI.html> (last visited: Jul. 11, 2022).

¹⁵ Ashley Nellis, *The Color of Justice: Racial and Ethnic Disparity in State Prisons*, THE SENT'G PROJECT (2021), <https://www.sentencingproject.org/wp-content/uploads/2016/06/The-Color-of-Justice-Racial-and-Ethnic-Disparity-in-State-Prisons.pdf>.

¹⁶ PRISON POLICY INITIATIVE: PRISON GERRYMANDERING PROJECT, *Solutions*, <https://www.prisonersofthecensus.org/solutions.html> (last visited: Jul. 11, 2022).

As we review and seek to address many of the issues in the 2020 Census, the Urban League of Detroit & Southeastern Michigan will continue to address the digital divide for our rural and poor Black communities and the language needs for our increasingly diverse Black and Brown immigrant communities. We will also continue to engage with the ACS and population estimates in preparation for the next Decennial Census in 2030; ensure there are adequate resources for hiring and training of staff (e.g., enumerators); and continued engagement of a multi-racial coalition at the regional, state, and local level to ensure the accurate count of Black and Brown communities, especially young Black children and Black men.

Thank you again, Senator Peters, for the opportunity to bring local attention to Michigan's successes and opportunities for improvement in the fair and accurate counting of Michiganders. I look forward to answering your questions.

Written Testimony of Jane C. Garcia – HSGAC Census Hearing – July 25, 2022

Honorable Senator –

As a former census employee who worked over 4 censuses, 1980 – 2010, I know the importance of preparation to complete a thorough and accurate census. It takes approximately 10 years to prepare for a census. This did not happen in 2020.

The Census Bureau's decision in 2012 to close 50% of the regional offices radically changed the Field Regional Office structure and had a devastating impact on the logistics of the census. The Bureau determined that closed offices could be replaced by public internet response, which proved to be an epic failure. To make matters worse, the pandemic dealt a significant blow on the ability to obtain an accurate enumeration of communities through their long-time policy of visiting households/addresses door-to-door. Amid an unprecedented health crisis, people were not answering their doors, or even their phones, if the number or person was unknown to them.

The Census Bureau undertook this radical change of its field structure in 2012, with no testing of the impact to procedures, methodology, training, administrative or technical support and a complete disregard of the effect these changes would have on the total count. The last-minute attempts to reestablish the Partnership Program, (partnership with community non-profits and organizations) was too little too late and only added to the chaos.

2020 resulted in a significant undercount of our Nation's population, especially in traditionally underserved, low-income communities. The Midwest and Northeast have been the most impacted, losing a significant number of congressional seats. Congress relies on accurate census data to make fundamental funding decisions. Change must be made NOW to ensure better, thorough results in 2030!

In closing, key considerations for success in 2030 include

- Immediate reopening of Regional Field Offices – Field Offices are vital for an accurate census.
- More funding put into the Partnership Program – this program has proven effective in obtaining resident trust and response in past census. 2020's last minute efforts to involve local non-profits and community organizations contributed to low response and undercounts. 2030 MUST establish these relationships NOW.
- Resource planning must be immediate and ongoing.

Respectfully,

Jane C. Garcia



www.accesscommunity.org

Testimony of

Maha Freij
Chief Executive Officer
ACCESS

Before the
United States Senate
Committee on Homeland Security

“Reviewing the 2022 Census: Local Perspectives in Michigan”

July 25, 2022

Chairman Peters, and distinguished members and staff of the Senate Homeland Security and Government Affairs Committee, it is my honor to address this Committee on behalf of ACCESS, the nation's largest service provider to Middle Eastern and North African, or MENA, communities. ACCESS provides direct services to over 80,000 low-income and high-need clients across the southeast Michigan area on an annual basis, many of whom are immigrants and refugees. ACCESS also provides culturally and linguistically appropriate services to individuals of MENA descent, who tend to have limited English proficiency, limited access to capital, and barriers to established pathways to sustained and intergenerational academic and professional achievement.

For the MENA community, and the entire country writ large, the successful execution of the decennial Census is one of the most important activities that the United States government supports. The decennial census produces the fundamental understanding for legislators, policymakers, and community advocates of who lives in our country, what they need, where they are, and what they are going through.

In this context, the Senate Homeland Security and Government Affairs Committee serves a critical function. This Committee provides oversight over the Census Bureau in its preparation for and execution of the decennial census. Input from community-based organizations is a vital part of the preparation of the oversight process. Community-based organizations are the connective tissue between policymakers, agency officials, and the individuals who have the most to lose or gain from an unsuccessful or otherwise inadequate enumeration of the decennial census. Ultimately, it is citizens, families, and communities, who seek representation in the Census data.

This was the case for the MENA community, who fought for formal recognition by the Census Bureau in a long and rigorous process that began in 2012, when the Commerce Secretary re-chartered the National Advisory Committee on Racial, Ethnic, and Other Populations.¹ In May of 2015, the Census Bureau convened community representatives and technical experts around the question of how best to test, assess, and implement a response category for MENA self-identification.² After reviewing the findings from the 2015 National Content Test, the Census Bureau issued a formal recommendation to the Office of Management and Budget, whose Federal standards ultimately determine the Census categories. The Census Bureau wrote that "it is optimal to use a dedicated "Middle Eastern or North African" response category."³

At that point, ACCESS, the National Network for Arab American Communities, and our many allies and advocacy partners awaited the news of MENA community inclusion. However, before the OMB could ultimately consider the Census Bureau's recommendation, the Trump

¹ <https://www.census.gov/about/cac/nac.html>

² <https://www.census.gov/library/working-papers/2015/demo/2015-MENA-Experts.html>

³ Department of Commerce. (2017, February). *2015 National Content Test: Race and Ethnicity Analysis Report*. Census Bureau & Economics and Statistics Administration: p. xiii. <https://www2.census.gov/programs-surveys/decennial/2020/program-management/final-analysis-reports/2015nct-race-ethnicity-analysis.pdf>

administration's Department of Commerce decided to undermine and ignore the Census Bureau's official recommendation. As a result, individuals from the MENA region were misrecognized on the decennial Census and continue to be misunderstood, understudied, and effectively excluded from the policy making process.

In this sense, the MENA community stands in a similar place now relative to 2012. Except for two crucial differences. One, a MENA response category has already been researched, tested, and formally recommended. Two, and perhaps most importantly: the administration with the authority to establish a MENA category favors the mission of the Census Bureau to develop a complete and accurate portrayal of our national diversity.

As a candidate for President, Joe Biden issued a "Plan for Partnership" with "the Arab American Community."⁴ In this plan, then-Candidate Biden pledged to "support the creation of a new Middle East North Africa (MENA) category," and cited the research of the MENA category conducted as part of the Census Bureau's 2015 National Content Test. Since taking office, President Biden has reaffirmed his commitment to racial and ethnic equity through Executive action.

In turn, Congress, and the people of this great nation, have supported several trailblazing advocacy efforts to help distinguish the MENA community on federal forms.

In February of 2022, Senator Peters (D-MI) introduced legislation, that would identify MENA communities as "underserved" to effectively distribute disaster response, resilience, and recovery funds from the Federal Emergency Management Agency.⁵ On Tuesday, April 26th, you also sent a letter as the Chairman of HSGAC to the OMB requesting that they prioritize the establishment of a MENA category across all Federal forms as part of their process of revising the Federal standards for data on race and ethnicity.⁶ That same day, the National Network for Arab American Communities (NNAAC), a national institution of ACCESS, worked with the offices of Representative Rashida Tlaib, Anna Eshoo, Debbie Dingell, and Robin Kelly to introduce H.R. 7591, the "Health Equity and MENA Community Inclusion Act," which would authorize additional funds to HHS for equitable inclusion of the MENA community in federal programs that address minority health concerns and health disparities.⁷

Then, on Tuesday, June 14th, just one day before the OMB announced that they were initiating the process of revising the Federal race and ethnicity standards, NNAAC worked with the House

⁴ <https://joebiden.com/joe-biden-and-the-arab-american-community-a-plan-for-partnership/>

⁵ S.3502 - 117th Congress (2021-2022): Achieving Equity in Disaster Response, Recovery, and Resilience Act of 2022. (2022, February 2). <http://www.congress.gov/>.

⁶ <http://www.hsgac.senate.gov/media/majority-media/peters-urges-omb-to-include-middle-east-north-africa-category-in-federal-standards-for-gathering-data-on-race-and-ethnicity>

⁷ H.R.7591 - 117th Congress (2021-2022): Health Equity and MENA Community Inclusion Act of 2022. (2022, April 26). <http://www.congress.gov/>.

Committee on Oversight and Reform to send a letter to the OMB requesting that they establish a MENA category in the Federal standards for data on race and ethnicity.

These actions underscore how, despite the unprecedented politicization of the Census Bureau's statistical function, significant popular support persists for MENA inclusion.

More is required than just MENA inclusion to protect the vital statistical function of the Census Bureau. Without statistical representation, communities are neither heard from nor properly addressed, while the important job of political representation suffers from critical gaps in knowledge and situational awareness. As we prepare for the 2030 Census, we must reflect and draw out vital lessons learned from the preparation for and execution of the 2020 Census, which suffered from an unprecedented pandemic, a systematic politicization of statistical functions, and communication breakdowns between government and civil society.

Among these learned lessons include the importance of maintaining adequate funding levels for research operations, field personnel, digital infrastructure, and data security.

Regarding their research operations, the Census Bureau conducted less field tests in high-minority and rural communities in 2020 relative to 2010. They also replaced plans to conduct a "dress rehearsal" in three diverse sites with plans to conduct a single "End to End" test in one urban site. Regarding field personnel, Congressional appropriators requested staffing levels equal to that authorized for FY2009, despite previously articulated plans to add 1,500 partnership specialists by 2019. Enumeration of the decennial Census also suffered from the Trump administration's placement of undue restrictions on who can be hired as enumerators. Whereas green card holders were permitted to be considered as enumerators in 2010, they were not in 2020. Moreover, the Census Bureau ran background checks differently, and with more rigorous conditions in the lead-up to the 2020 Census. For marginalized communities, data security is a critical factor in securing buy-in and improving response rates among marginalized communities. Still, many of the Census Bureau's cybersecurity-related tests were either delayed or postponed. As they consider preparation for the 2030 Census, the Census Bureau must prioritize robustness of their research operations, diversity in their field personnel, accessibility and intelligibility in their digital infrastructure, and trust in their efforts to ensure and promulgate data security.

Also included are lessons concerning the value of preparing community-based organizations to effectively communicate the data integrity and security of the Census operations. Although the Census Bureau built an impressive survey response infrastructure comprising smart phones, computers, land phones, paper forms and other devices, the Bureau's communication strategy came short of adequately informing the public about these options and how to utilize them. The Bureau also failed in adding functionality such as additional language support to some of its survey response infrastructure and of notifying community, particularly the immigrant community, of the availability of 12 non-English language support centers or the availability of Census forms in their native language, including Arabic. As a result of these deficiencies, ACCESS became aware of various reports of community members not understanding the purpose of the test and discarding Census materials received in the mail.

HSGAC must ensure that the Census once again becomes a scientific agency true to its mission: to collect the data that most accurately represents the reality of life in this country. Most importantly, to develop a complete and accurate account of everyone who resides in the United States. This includes the establishment of a MENA category, the production of more accessible data products, complete with state and metropolitan-level data on basic demographics, and prioritization of the aforementioned changes to the Census Bureau's research and field operations, communications strategy, and data security practices.

I look forward to the work of preparing for a 2030 Census that stays true to the vital statistical function of the decennial Census.



TO: Gary C. Peters, Chairman
Senate Committee on Homeland Security & Governmental Affairs

FROM: Kelley J. Kuhn, President & CEO
Michigan Nonprofit Association

DATE: July 25, 2022

SUBJECT: Reviewing the 2020 Census: Local Perspectives in Michigan

Introduction

Good morning. My name is Kelley Kuhn, president and CEO of Michigan Nonprofit Association (MNA). Founded in 1990, MNA is a 501 c (3) statewide membership organization that serves nonprofits through advocacy, training, and resources. MNA is dedicated to promoting anti-racism and social justice in the nonprofit sector.

The 2020 census was more than a population count — it was an opportunity to make a difference and to shape Michigan's future.

MNA and the Council of Michigan Foundations, with financial support of more than 40 foundations and the State of Michigan, launched an ambitious campaign to mobilize nonprofits and help Michigan get a complete and accurate count in the 2020 Census. The campaign raised more than \$10 million and engaged hundreds of nonprofits in a nonpartisan, multi-racial coalition with for-profit organizations and government.

Focus on Historically Undercounted Populations

Nonprofits invested energy, time, and commitment in the Michigan Nonprofits Count Campaign to ensure a fair and accurate census for all communities — particularly Michigan's historically undercounted populations — people of color, immigrants and their families, young children, seniors, people who live in poverty, and people experiencing homelessness. The undercount has led to inequality in political power, government funding, and private-sector investment for these communities; thus, the Nonprofits Count Campaign was developed, leveraging nonprofits as trusted outreach partners, with a specific goal to reach these undercounted groups.

Diversity, Equity and Inclusion

To reach diverse populations and encourage completion of the census, as well as serve as champions of the campaign, MNA entered into a partnership with New Michigan Media, a network that includes more than 140 ethnic and non-traditional media outlets across Michigan. Dr. Hayt Oshagan, president of New Michigan Media, convened three minority media summits that informed the messaging directions of the campaign.

The campaign's intentional focus on diversity, equity, and inclusion in grantmaking resulted in all grants being awarded to organizations serving historically undercounted populations.

Collaboration

The campaign worked with government officials at all levels to maximize effectiveness. This cooperation primarily resulted in avoiding duplication of efforts and enhancing outreach. We received regular updates from Michigan's state demographer, collaborated with the Census Bureau's partnership specialists, and held specific training sessions and webinars on how to engage local government entities so they were ready for the 2020 Census.

While getting the census count has never been an easy task, when we started this journey in 2017 we couldn't have predicted what was to come in 2020. We faced multiple challenges, including confusion over the late addition of a citizenship question, disinformation, misinformation, and a global pandemic that caused shifting deadlines and wreaked havoc with our get-out-the-count plans.

With Michigan under a stay-at-home order and suffering one of the highest COVID-19 rates in the nation in the spring of 2020, the Nonprofit Counts campaign had to quickly retool. Nonprofits were creative and flexible, yet still sensitive and safe, given the crisis. The campaign adjusted by expanding digital outreach, creating videos for children now that kids were at home, expanding texting campaigns and identifying new partners. Nonprofits also had a presence in the few places people were still frequenting in person such as food banks. Filling out the census online, by mail or over the phone was not an option for some due to a lack of internet access, language and reading barriers and other concerns.

Results

Thanks in part to nonprofits' hard work, Michigan finished eighth in the U.S. in self-response rate. On June 17, 2020, we became the first state in the nation, to have exceeded its 2010 self-response rate. We also ranked third-best in the nation for the largest gain in statewide response from the 2010 census, rising from 67.7% to 71.3%.

Most importantly at the local level, in every census tract where the nonprofit campaign was active, the self-response rate averaged 7% higher than in census tracts where the campaign was not active.

Lessons for 2030 Census

Going forward, we are sharing concrete examples of ways our partners can engage in census work throughout the decade. Underlying the activities are the policy and advocacy work that needs to be done all decade long to ensure adequate funding for the Census Bureau; advocacy for updated questionnaires (including revised race/ethnicity questions and sexual orientation and gender identity questions); and input on operational changes and any legislative recommendations resulting from the experiences and aftermath of the 2020 Census.

MNA regularly communicates with the network that was built in 2020. We include results of the census data, webinars on using the data, opportunities for advocacy, and much more. By investing our time now, we can lay a strong foundation for those who will work to get our communities counted in 2030.

Conclusion

The success that Michigan had in the 2020 Census couldn't have happened without nonprofits. Nonprofits are trusted entities serving as catalysts for continued civic and community engagement.

The Nonprofit Counts campaign built a strong foundation for a fairer and more equitable Michigan where everyone counts, and every voice is heard.

I'd like to thank Chairman Peters and his staff for the opportunity to speak today. We are grateful for your work on the Census and for everything you do on behalf of Michigan's nonprofits.